

COURT FILE NUMBER 24-3356741

Clerk's Stamp

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.

APPLICANT **ENDRUM ENERGY CORP.**

RESPONDENTS **2672682 ALBERTA LTD., JAKE ENERGY
INC., and BRAD PEAKE**

DOCUMENT **AFFIDAVIT**

ADDRESS FOR
SERVICE AND
CONTACT
INFORMATION OF
PARTY FILING THIS
DOCUMENT

LAWSON LUNDELL LLP
Barristers and Solicitors
1100, 225 – 6th Avenue SW
Brookfield Place
Calgary, AB T2P 1N2
Attention: Jennie A. Buchanan
Telephone: (403) 269-6900
Fax: (403) 269-9494
Email: jbuchanan@lawsonlundell.com
File No.: 119661-195145

AFFIDAVIT OF FRANKIE DENI

Affirmed September 15, 2026

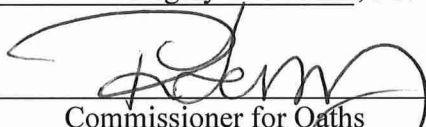
I, Frankie Deni, of the City of Calgary, in the Province of Alberta, SOLEMNLY AFFIRM AND DECLARE THAT:

1. I am a Legal Assistant with the Calgary law firm, Lawson Lundell LLP (**Lawson Lundell**). Lawson Lundell is counsel to the Respondents, 2672682 Alberta Ltd., Jake Energy Inc. and Brad Peake, and as such have personal knowledge of the matters herein deposed to except where stated to be based upon information and belief, in which case I believe the same to be true.
2. Attached hereto as **Exhibit 1** is an email from Susy Trace of Ogilvie LLP (**Ms. Trace**), counsel for the Applicant, Endrum Energy Corp. (**Endrum**), to Jennie Buchanan of Lawson Lundell (**Ms. Buchanan**) received on August 24, 2026.

3. Attached hereto as **Exhibit 2** is an email (without enclosures) from Terry McNeill of Pine Cliff Energy Inc. to Ms. Buchanan received on August 27, 2026.
4. Attached hereto as **Exhibit 3** is an email from Ms. Buchanan to Ms. Trace sent on September 4, 2026.
5. Attached hereto as **Exhibit 4** is an email from Ms. Buchanan to Ms. Trace, Leah Macklin of Ogilvie LLP (**Ms. Macklin**) and counsel to the Proposal Trustee, Bren Cargill of Witten LLP (**Mr. Cargill**) sent on September 4, 2026.
6. Attached hereto as **Exhibit 5** is an email (with enclosures) from Ms. Buchanan to Ms. Trace, Ms. Macklin and Mr. Cargill sent on September 9, 2026.
7. Attached hereto as **Exhibit 6** is an email from Ms. Trace to Ms. Buchanan received on September 9, 2026.
8. Attached hereto as **Exhibit 7** is an email attaching a letter from Ms. Buchanan to Ms. Trace, Ms. Macklin and Mr. Cargill sent on September 14, 2026.

AFFIRMED BEFORE ME

on September 15, 2026
at Calgary, Alberta.



Commissioner for Oaths
in and for the Province of Alberta



FRANKIE DENI

Robyn Dawn Lenz
Commissioner for Oaths
in and for the Province of Alberta
My commission expires on November 19, 2026

This is **Exhibit 1** referred to in the
Affidavit of **Frankie Deni** affirmed
before me this 15th day of September,
2026.



A Commissioner for Oaths in and for
Alberta

Robyn Dawn Lenz
Commissioner for Oaths
in and for the Province of Alberta
My commission expires on November 19, 2026

Frankie Deni (4518) - 11Flr

From: Susy Trace <STrace@ogilvieilaw.com>
Sent: Monday, August 24, 2026 10:17 AM
To: Jennie Buchanan (4549) - 11Flr; Garrett Chan; Bren Cargill
Cc: Leah Macklin; Kaitlynd Hiller; Frankie Deni (4518) - 11Flr
Subject: RE: Endrum Energy Corp. – NOI Proceedings (Court File No. 24-3356741) – Monday's Application

EXTERNAL EMAIL - This email was sent by a person from outside your organization.

Jennie,

Thank you for your email. I respond to the two matters you have raised in turn.

The McMahon Affidavit

Endrum acknowledges that the McMahon Affidavit was served outside the timelines contemplated by the Commercial Practice Note and the Rules of Court. However, we respectfully disagree with your characterization that Endrum failed to bring this development to the Respondents' attention at the earliest practicable opportunity.

The broader development, namely, that the processing facilities are refusing to accept all of Endrum's oil shipments, not merely those from the three disputed wells, only came to Endrum's attention on Thursday. That development is the substance of Mr. McMahon's Affidavit. With respect to the specific exhibits you have identified:

- The text messages at Exhibit A (dated July 30) reflect Secure's communication of its position on that date. However, at that time Endrum nevertheless retained access to the Pinecliff facility, which at least preserved the option for Endrum to continue generating revenue. It was only upon receipt of the subsequent notification from Pinecliff that a material development arose, the complete loss of any processing capacity, necessitating the introduction of additional evidence before the Court.
- The text messages at Exhibits B and C (dated August 20) arose only two days before the Affidavit was served. Service at 5:41 p.m. on the Friday afternoon was as prompt as counsel could manage given the time required to obtain instructions, prepare and finalize the Affidavit, and have it sworn by Mr. McMahon. With respect, the suggestion that the Affidavit ought to have been prepared and sworn earlier in the day is not reasonable in the circumstances. If the Respondents maintain otherwise, we would invite counsel to identify the precise hour at which they consider it would have been reasonable for Endrum's counsel to have drafted the Affidavit and had it sworn and to set out the assumptions underlying that position.

Endrum is in NOI proceedings and actively pursuing a restructuring proposal. The refusal to process any of Endrum's oil production for the month of August materially impacts its cash flow and its ability to advance that proposal. In these circumstances, Endrum has no meaningful alternative but to place this development before Justice Harris in advance of today's hearing, and the Court must be made aware of it.

Endrum will be delivering the McMahon Affidavit to Justice Harris this morning as indicated in my email to you on Friday. The Respondents are, of course, free to note their objections as they see fit. Whether an adjournment for cross-examination or responding evidence is warranted is a matter for the Court; however, Endrum will oppose any such

adjournment given the urgency of the matter and the prejudice to its restructuring efforts that any further delay would occasion.

Endrum reserves all of its rights against Jake Energy arising from this disruption to its operations.

Endrum's Revised Proposed Form of Order

Given Endrum's role as the operator bearing responsibility for the environmental and reclamation obligations associated with these assets, Endrum prefers to maintain the language in paragraphs 1 and 2 of the proposed Order in its current form at this stage. We are, however, happy to discuss the matter further if that would be of assistance.

Kind regards,

Susy

Susy Trace | Partner



Together
in purpose.

2800 Stantec Tower | 10220 103 Avenue | Edmonton, AB T5J 0K4 | www.ogilvielaw.com
Direct: (780) 429-6246 | Fax: (780) 429-4453 | Main: (780) 421-1818 | Email: STrace@ogilvielaw.ca



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From: Jennie Buchanan <jbuchanan@lawsonlundell.com>

Sent: August 24, 2026 8:16 AM

To: Susy Trace <STrace@ogilvielaw.com>; Garrett Chan <garrett@gcalit.ca>; Bren Cargill <bcargill@wittenlaw.com>

Cc: Leah Macklin <LMacklin@ogilvielaw.com>; Kaitlynd Hiller <KHiller@ogilvielaw.com>; Frankie Deni <fdeni@lawsonlundell.com>

Subject: RE: Endrum Energy Corp. – NOI Proceedings (Court File No. 24-3356741) – Monday's Application

Susy,

I am writing to provide my clients' position regarding the McMahon Affidavit and to seek clarification regarding your client's revised proposed form of Order.

The McMahon Affidavit

- The Respondents object to the Endrum filing the Affidavit before today's hearing because they have not received authorization from a Justice of the Commercial Practice Group to deviate from the normal filing deadlines set out in para 24 of Commercial Practice Note 1.
- The Respondents object to Endrum relying on the Affidavit at today's hearing for the reasons set out in my email to you on Saturday (include below).
- The Respondents reserve the right to ask the Court to adjourn the hearing of Endrum's injunction application to allow for cross-exam and additional responding evidence.

If your office will be delivering a copy of the McMahon Affidavit to Justice Harris this morning, we expect to be copied and intend to send our own letter setting out our objections (and will copy you and the Proposal Trustee).

Endrum's revised proposed form of Order

As I read the revised proposed form of order you circulated on Friday, the relief set out in para 1 of Endrum's proposed Order form of order is permanent (no proposed end date or event that would terminate the effect of para 1 of the proposed form of Order).

Similarly, para 2 is proposed to apply "pending final resolution of the dispute over ownership of the Disputed Assets whether by further Order of this Honourable Court or by written agreement between the parties"; however, there are presently no legal proceedings to obtain a final resolution of the ownership dispute. As such, the relief sought in para 2 is, for all intents and purposes, also permanent.

Could you please advise if Endrum intends to revise its proposed form of Order to provide for end dates and/or terminating events for the relief it seeks?

Thank you

Jennie Buchanan (she/her) | Partner
Lawson Lundell LLP
D 403.218.7549

From: Jennie Buchanan (4549) - 11Flr

Sent: Saturday, August 22, 2026 8:33 PM

To: Susy Trace <STrace@ogilvielaw.com>; Garrett Chan <garrett@gcalit.ca>; Bren Cargill <bcargill@wittenlaw.com>

Cc: Leah Macklin <LMacklin@ogilvielaw.com>; Kaitlynd Hiller <KHiller@ogilvielaw.com>; Frankie Deni (4518) - 11Flr <fdeni@lawsonlundell.com>

Subject: RE: Endrum Energy Corp. – NOI Proceedings (Court File No. 24-3356741) – Monday's Application

Importance: High

Susy,

I do not yet have instructions, but am writing to advise that I expect instructions to object to Endrum filing Mr. McMahon's Affidavit, providing Mr. McMahon's Affidavit to Justice Harris prior to Monday's hearing, or relying on Mr. McMahon's Affidavit at Monday's hearing. I expect instructions tomorrow morning and will confirm our position once I have instructions.

If Endrum insists on filing Mr. McMahon's affidavit and/or sending it to Justice Harris prior to the commencement of the hearing, then we expect that Endrum will note our objections in its letter to Justice Harris.

Contrary to your email, this "new development" is not being brought to our attention "at the earliest opportunity" or "as promptly as possible". Endrum ought not be permitted to rely on Mr. McMahon's Affidavit for at least the following reasons:

- Endrum has not complied with either the Commercial Court deadlines or the Rules of Court.
- The text messages at Exhibit A to Mr. McMahon's affidavit are from July 30. Endrum has had ample opportunity to put these text messages into evidence by filing an affidavit on proper notice under the Rules and in accordance with the Commercial Court's deadlines.
- Mr. McMahon's Affidavit states that the text messages at Exhibits B and C are from August 20. Endrum could have provided the Respondents with prompt notice that it would seek to introduce these text messages into evidence. At minimum, prompt notice would have been an email or phone call from counsel on Friday morning advising about these text messages and Endrum's intention to prepare and seek to file a late affidavit to enter these text messages into evidence.
- Instead of complying with the Rules of Court and the Commercial Court deadlines, or providing prompt notice of new evidence, Endrum waited until 5:41pm on the Friday before the hearing to serve Mr.

McMahon's Affidavit. Delivering this Affidavit after close of business on a Friday without any prior warning has effectively prevented the Respondents from taking any meaningful steps in advance of Monday's hearing to investigate the veracity of the claim that Secure and Pine Cliff are refusing to accept all oil shipments from Endrum and respond.

Jennie Buchanan (she/her) | Partner
Lawson Lundell LLP
D 403.218.7549

From: Susy Trace <STrace@ogilvielaw.com>
Sent: Friday, August 21, 2026 5:41 PM
To: Garrett Chan <garrett@gcalit.ca>; Bren Cargill <bcargill@wittenlaw.com>; Jennie Buchanan (4549) - 11Flr <jbuchanan@lawsonlundell.com>
Cc: Leah Macklin <LMacklin@ogilvielaw.com>; Kaitlynd Hiller <KHiller@ogilvielaw.com>
Subject: Endrum Energy Corp. – NOI Proceedings (Court File No. 24-3356741) – Monday's Application
Importance: High

EXTERNAL EMAIL - This email was sent by a person from outside your organization.

Garrett, Bren, and Jennie,

We are reaching out as promptly as possible given your interest in Monday's application. We have just learned that both of Endrum's processing facilities, Secure Waste Infrastructure Corp. and Pine Cliff Energy Ltd.'s MudSprings Oil Battery, are refusing to accept all oil shipments from Endrum, not just shipments from the three disputed wells, leaving Endrum with no vendor to process any of its oil for the month of August. This is a significant development affecting Endrum's operations and its proposal efforts, and we wanted to bring it to your attention at the earliest opportunity. Given the significant impact this has on Endrum's cashflow, we felt we had no choice but prepare a late affidavit so that the Court is aware of this recent development on Monday.

In advance of Monday's hearing, we attach the following documents:

1. The sworn Affidavit of John McMahon, President of Endrum (to be sent for filing on Monday);
2. The revised proposed form of Injunction and Preservation Order (updated to, among other technical matters necessitated by the application having been adjourned twice, permit Endrum to deduct transportation and maintenance costs from gross revenues from the disputed wells); and
3. The blackline of the revised form of order to the order originally circulated with our application materials.

The Affidavit will be filed on Monday, at which point it will also be formally served. The unfiled Affidavit, revised form of order, and blackline will also be provided to the Commercial Court Coordinator on Monday for the attention of Justice Harris in advance of the application.

Please do not hesitate to contact me on my cell should you have any questions (780-394-3272).

Kind regards,

Susy

Susy Trace | Partner



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This is **Exhibit 2** referred to in the
Affidavit of **Frankie Deni** affirmed
before me this 15th day of September,
2026.



A Commissioner for Oaths in and for
Alberta

Robyn Dawn Lenz
Commissioner for Oaths
in and for the Province of Alberta
My commission expires on November 19, 2026

Frankie Deni (4518) - 11Flr

From: Terry McNeill <TMcNeill@pinecliffenergy.com>
Sent: Thursday, August 27, 2026 10:08 AM
To: Jennie Buchanan (4549) - 11Flr; Shannon K. Hayes (4514) - 11Flr
Cc: Phil Hodge
Subject: FW: Pine Cliff Energy Ltd.
Attachments: August 20 2026 Affidavit with exhibits - John McMahon - Executed.pdf; Third Morales Affidavit - Body and Exh BB.pdf; Injunction and Preservation Order.pdf

EXTERNAL EMAIL - This email was sent by a person from outside your organization.

Thank you for passing this along Shannon.

Jennie.... Last week I requested that our field discontinue taking any fluid from Endrum, Jake Energy, 2672682 Alberta Inc., Steven Oldale or Brad Peake until further notice. We are under no obligation to accept fluid from any of these producers, and the small amount of revenue generated from processing fluid with questionable ownership is far outweighed by the risk and potential cost of legal defence should Pine Cliff become involved in any type of legal dispute. We have already seen an example of this risk. Both a local surface landowner and Pine Cliff were served with a Statement of Claim by a vendor of Endrum for unpaid bills, despite the fact that we are an unrelated party. Our involvement appears to have been triggered simply because these parties use our roads to access their sites.

I also spoke with Susy Trace at Ogilvie Law last week, who represents Endrum. I advised Susy that if we receive clear direction that eliminates any potential legal risk to Pine Cliff relating to ownership of the fluid, we would consider accepting Endrum's fluid again. However, that direction would need to be very clear and provide comfort that Pine Cliff will not be pulled into a legal dispute. Until that is provided to our satisfaction we will not be taking any fluid. I reiterated that Pine Cliff is under no obligation to accept fluid from any of the parties noted above.

Hopefully this is helpful.

Terry

Terry McNeill
 Chief Operating Officer
 Pine Cliff Energy Ltd
 587-233-0503 - Desk
 587-582-6000 - Cell

From: Phil Hodge <PHodge@pinecliffenergy.com>
Sent: August 26, 2026 10:16 AM
To: Terry McNeill <TMcNeill@pinecliffenergy.com>
Subject: FW: Pine Cliff Energy Ltd.

Involves mud springs and Endrum/Jake Energy.

From: Shannon K. Hayes <shayes@lawsonlundell.com>
Sent: Wednesday, August 26, 2026 8:45 AM
To: Phil Hodge <PHodge@pinecliffenergy.com>

Cc: Jennie Buchanan <jbuchanan@lawsonlundell.com>

Subject: FW: Pine Cliff Energy Ltd.

Hi Phil,

Thanks again for having us at your amazing birthday party. It was such a nice night to catch up with everyone.

Sorry to bug you on this, but I came across a situation in one of our client's disputes (not involving Pine Cliff as a party), but where a party is making representations about Pine Cliff and filing evidence about Pine Cliff's position on things and the remedy that party is seeking could impact Pine Cliff's rights.

I wanted to make you aware of this.

My partner Jennie Buchanan is running the file (I am not involved) and gave a little description below. Perhaps you could pass this along to the appropriate person at Pine Cliff and Jennie could connect with them? They are back in court on Friday.

Thanks and if you have any concerns or questions, please let me know. Shannon.

Shannon Hayes, KC, FCI Arb | Partner
Lawson Lundell LLP
D 403.218.7514

From: Jennie Buchanan (4549) - 11Flr <jbuchanan@lawsonlundell.com>

Sent: Tuesday, August 25, 2026 12:24 PM

To: Shannon K. Hayes (4514) - 11Flr <shayes@lawsonlundell.com>

Subject: Pine Cliff Energy Ltd.

Hi Shannon,

Our client is in a dispute over the ownership of 3 wells. The opposing party (Endrum) has brought an injunction application to permit them to operate the 3 wells (and not our client). Endrum has filed evidence purporting to be from Pine Cliff to support its application.

Endrum alleges that because of the dispute on the 3 wells, Pine Cliff won't accept ANY of Endrum's oil (including from many wells apart from the 3 wells) until the ownership issue on the 3 wells is resolved. In support they've filed affidavits exhibiting some text messages between their foreman and one of their contract operators describing what someone at Pine Cliff's Mudsprings facility told the contract operator. In Court yesterday, opposing counsel also made some representations about a conversation she had with someone at Pine Cliff to the effect that: if the Court grants the applicant's injunction order, Pine Cliff will accept Endrum's oil for processing.

I'm sharing this for 3 reasons:

1. As far as I can tell, Pine Cliff has not been served with the applicant's materials. Pine Cliff should be made aware that the applicant is leading evidence and making representations to the Court about Pine Cliff.
2. Pine Cliff may want to assess whether the order the applicant is seeking could affect their rights, particularly considering opposing counsel's representations that the order will result in Pine Cliff processing the applicant's oil from (whether from the disputed wells or otherwise).
3. We would also like to know:
 1. Whether Pine Cliff has refused to accept oil from the applicant's other wells (not the wells in dispute),
 2. If so, whether it's true that Pine Cliff will accept oil from the applicant's other wells if the Court grants the applicant's order, and

3. If obtaining the order is the only way that Pine Cliff will accept oil from the applicant's other wells.

I've attached the applicant's affidavit evidence. See Affidavit of John McMahon, paras 12-16 and Exhibits B and C; Third Affidavit of Norman Morales, para 70 and Exhibit BB; and the requested Order.

Thanks



JENNIE BUCHANAN (she/her) | Partner

D 403.218.7549 | E jbuchanan@lawsonlundell.com

LAWSON LUNDELL LLP Suite 1100, 225 - 6th Avenue S.W., Brookfield Place, Calgary, AB T2P 1N2

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This is **Exhibit 3** referred to in the
Affidavit of **Frankie Deni** affirmed
before me this 15th day of September,
2026.

A handwritten signature in black ink, appearing to read 'Robyn', written over a horizontal line.

A Commissioner for Oaths in and for
Alberta

Robyn Dawn Lenz
Commissioner for Oaths
in and for the Province of Alberta
My commission expires on November 19, 2026

Frankie Deni (4518) - 11Flr

From: Jennie Buchanan <jbuchanan@lawsonlundell.com>
Sent: Friday, September 4, 2026 10:56 AM
To: Susy Trace; Leah Macklin
Cc: Bren Cargill
Subject: Endrum / 267 Alberta

Susy and Leah,

In preparation for next week's deadline to file materials in response to Endrum's application to extend the Injunction Order, I am writing to request:

- copies of any correspondence that that Endrum (or anyone acting on Endrum's behalf) has sent to contractors, suppliers, vendors, operators or third parties (including, but not limited to, SECURE, Pine Cliff, Endrum's Production Accountant) regarding the Injunction Order or Endrum's rights pursuant to the Injunction Order, together with any responses to such correspondence; and
- information about any oil that Endrum has shipped from the 5-29 Well, the 6-34 Well, or 2-11 Well (e.g., volume shipped, destination).

I would be grateful to receive this information by end of day Monday (and presume that at least some of this information will be included in an affidavit that Endrum will file on Monday).

I'm available for a phone call if you have questions or concerns about this request. Thank you in advance.

Best.



JENNIE BUCHANAN (she/her) | Partner
D 403.218.7549 | E jbuchanan@lawsonlundell.com
LAWSON LUNDELL LLP Suite 1100, 225 - 6th Avenue S.W., Brookfield Place, Calgary, AB T2P 1N2
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This is **Exhibit 4** referred to in the
Affidavit of **Frankie Deni** affirmed
before me this 15th day of September,
2026.



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Robyn Dawn Lenz
Commissioner for Oaths
in and for the Province of Alberta
My commission expires on November 19, 2026

Frankie Deni (4518) - 11Flr

From: Jennie Buchanan <jbuchanan@lawsonlundell.com>
Sent: Friday, September 4, 2026 6:01 PM
To: Susy Trace; Leah Macklin; Bren Cargill
Cc: Frankie Deni
Subject: RE: IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF ENDRUM ENERGY CORP. File No. 24-3356741

Susy, Leah, Bren:

Further to the below, I am writing regarding settlement of the final terms of the Injunction Order.

As previously communicated, there are several issues that need to be addressed:

1. Reversal of any changes Endrum makes / steps Endrum takes pursuant to the Injunction Order

We understand that the Injunction Order is not intended to make any permanent changes to the status of either party's possession/control over the Disputed Assets.

While Justice Harris made clear that the Injunction Order is to include a term providing that it is without prejudice to the party's rights to assert possession or ownership over the Disputed Assets, we are concerned that such a provision will not adequately protect 267 Alberta's rights, particularly in the event that Endrum does not make a (successful) proposal.

To ensure that 267 Alberta is not prejudiced by the Injunction Order, we propose adding paragraphs to the Injunction Order that expressly provide for the reversal of any changes Endrum may make / steps Endrum may take pursuant to the Injunction Order in the event that Endrum either becomes bankrupt or does not obtain an extension of the Injunction Order.

2. Section 81 hearing

Justice Harris directed the parties to commence a court process to determine whether BIA section 81 applies to the ownership dispute between Endrum and 267 Alberta. Ogilvie LLP has reserved a full-day hearing on November 12, 2026.

We would like to discuss whether Endrum and the Proposal Trustee would consider requesting that Justice Harris' vary her direction regarding BIA section 81 on the basis that a court proceeding to determine the application of that section may be practically moot if Endrum fails to make a proposal before October 7, 2026.

3. Timing of Section 81 hearing (if any)

If Endrum and the Proposal Trustee are not prepared to consider requesting that Justice Harris' guidance to vary her direction regarding BIA section 81, then we will need to resolve how the ownership dispute will be address in any proposal that Endrum may make.

4. Section 81 timing issue – date of possession

If Endrum and the Proposal Trustee are not prepared to consider requesting that Justice Harris' guidance to vary her direction regarding BIA section 81, then we will need to resolve the applicable "date of possession" for purposes of the section 81 hearing. It is preliminary understanding that the relevant "date of possession" differs depending on whether Endrum makes a proposal or becomes bankrupt.

5. Transparency issue

My clients request that terms be added to the Injunction Order to ensure transparency with respect to the implementation and effect of the Injunction Order, including with respect to:

- Endrum's communications with contractors, suppliers, vendors, operators or third parties (including, but not limited to, SECURE, Pine Cliff, Endrum's Production Accountant) regarding the Injunction Order or Endrum's rights pursuant to the Injunction Order; and
- The extent to which Endrum has been able to haul and sell oil following the granting of the injunction (whether from the Disputed Wells or otherwise);
- The total volume of any oil that Endrum has sold from the Disputed Wells since August 28, 2026; and
- Any changes to the conclusions or information set out in Proposal Trustee's Fourth Report, including (without limitation) any changes to:
 - the MAC conclusion at paras 18-20
 - the operating status of the Disputed Wells as described in paras 27-28; and
 - the Proposal Trustee's determination and comments at paras 35-36.

I am available for a further counsel if it would be useful.

Best,

Jennie Buchanan (she/her) | Partner
Lawson Lundell LLP
D 403.218.7549

From: Leah Macklin <LMacklin@ogilvielaw.com>

Sent: Monday, August 31, 2026 8:14 AM

To: Maria Lavelle <Maria.Lavelle@aer.ca>; Auch, Curtis J. <cauch@brownleelaw.com>; Susy Trace <STrace@ogilvielaw.com>; Jennie Buchanan (4549) - 11Flr <jbuchanan@lawsonlundell.com>; Bren Cargill <bcargill@wittenlaw.com>

Subject: RE: IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF ENDRUM ENERGY CORP. File No. 24-3356741

EXTERNAL EMAIL - This email was sent by a person from outside your organization.

Good morning,

Thank you for your replies.

Curtis and Maria, we will circulate the final form of order to you both once it has been settled.

Jennie, I will send out an invite for tomorrow morning at 9:30.

Bren, if that does not work for you and you wish to attend let me know and I am happy to find a new time that accommodates.

Thanks,
Leah

Leah Macklin | Lawyer

Together
in purpose.2800 Stantec Tower | 10220 103 Avenue | Edmonton, AB T5J 0K4 | www.ogilvIELaw.com
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From: Maria Lavelle <Maria.Lavelle@aer.ca>

Sent: August 31, 2026 8:06 AM

To: Auch, Curtis J. <cauch@brownleelaw.com>; Leah Macklin <LMacklin@ogilvIELaw.com>; Susy Trace <STrace@ogilvIELaw.com>; Jennie Buchanan <jbuchanan@lawsonlundell.com>; Bren Cargill <bcargill@wittenlaw.com>

Subject: RE: IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF ENDRUM ENERGY CORP. File No. 24-3356741

Thanks. I also will not be attending. But would similarly appreciate the final form of order. Regards,

Maria Lavelle, Legal Counsel

Law Branch

e maria.lavelle@aer.ca t 403-297-3736

a Suite 1000, 250 – 5 Street SW, Calgary, AB T2P 0R4

inquiries 1-855-297-8311 **24-hour emergency** 1-800-222-6514

Alberta
Energy
Regulator

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From: Auch, Curtis J. <cauch@brownleelaw.com>

Sent: August 30, 2026 9:29 PM

To: Leah Macklin <LMacklin@ogilvIELaw.com>; Susy Trace <STrace@ogilvIELaw.com>; Jennie Buchanan <jbuchanan@lawsonlundell.com>; Bren Cargill <bcargill@wittenlaw.com>; Maria Lavelle <Maria.Lavelle@aer.ca>

Subject: RE: IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF ENDRUM ENERGY CORP. File No. 24-3356741

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Hi Leah,

I don't see a need for my attendance, but I'd ask that the final form of the order be sent to us, for our records.

Thanks,

Curtis



CURTIS AUCH | ASSOCIATE | BROWNLEE LLP

MUNICIPAL AND UTILITY REGULATION

m. 403-232-8300 | d. 403-260-1474 | f. 403-232-8408 | cauch@brownleelaw.com

SUITE 1500 | 530 - 8 AVENUE SW | CALGARY, AB T2P 3S8

Toll-Free. 800-661-9069 | www.brownleelaw.com

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From: Leah Macklin <LMacklin@ogilvie.com>

Sent: Sunday, August 30, 2026 12:40 PM

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Subject: RE: IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF ENDRUM ENERGY CORP. File No. 24-3356741

Thank you, is anyone else planning on attending?

Thanks,
Leah

Leah Macklin | Lawyer



2800 Stantec Tower | 10220 103 Avenue | Edmonton, AB T5J 0K4 | www.ogilvie.com
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From: Susy Trace <STrace@ogilvielaw.com>

Sent: August 30, 2026 11:20 AM

To: Jennie Buchanan <jbuchanan@lawsonlundell.com>; Leah Macklin <LMacklin@ogilvielaw.com>; Auch, Curtis J. <cauch@brownleelaw.com>; Bren Cargill <bcargill@wittenlaw.com>; Maria Lavelle <Maria.Lavelle@aer.ca>

Subject: RE: IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF ENDRUM ENERGY CORP. File No. 24-3356741

Hi everyone, I can do Tuesday morning or any time Wednesday afternoon. I am not available on Thursday.

Thank you,

Susy

From: Jennie Buchanan <jbuchanan@lawsonlundell.com>

Sent: August 28, 2026 4:49 PM

To: Leah Macklin <LMacklin@ogilvielaw.com>; Susy Trace <STrace@ogilvielaw.com>; Auch, Curtis J. <cauch@brownleelaw.com>; Bren Cargill <bcargill@wittenlaw.com>; Maria Lavelle <Maria.Lavelle@aer.ca>

Subject: RE: IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF ENDRUM ENERGY CORP. File No. 24-3356741

Thanks for reaching out, Leah.

My availability:

- Tuesday, September 1: 930am-1130am; 3pm-430pm
- Wednesday, September 2: 2pm-430pm
- Thursday, September 3: 230pm-4pm

Jennie Buchanan (she/her) | Partner
Lawson Lundell LLP
D 403.218.7549

From: Leah Macklin <LMacklin@ogilvielaw.com>

Sent: Friday, August 28, 2026 3:23 PM

To: Susy Trace <STrace@ogilvielaw.com>; Auch, Curtis J. <cauch@brownleelaw.com>; Jennie Buchanan (4549) - 11Flr <jbuchanan@lawsonlundell.com>; Bren Cargill <bcargill@wittenlaw.com>; Maria Lavelle <Maria.Lavelle@aer.ca>

Subject: IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF ENDRUM ENERGY CORP. File No. 24-3356741

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Good afternoon,

Further to court this morning, we are writing to schedule a Teams meeting to settle the minutes of the order. The court directed that all counsel present this morning may participate in settling the minutes. If you would like to take part, please send us your availability for next week. We are available Monday afternoon but can find additional time throughout the week if you are not available.

Thanks,
Leah

Leah Macklin | Lawyer



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Direct: (780) 429-6280 | Fax: (780) 429-4453 | Main: (780) 421-1818 | Email: LMacklin@ogilvIELaw.com



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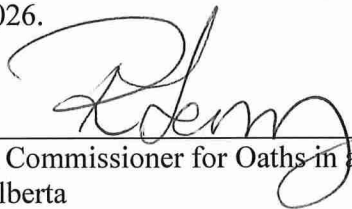
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This is **Exhibit 5** referred to in the
Affidavit of **Frankie Deni** affirmed
before me this 15th day of September,
2026.



A Commissioner for Oaths in and for
Alberta

Robyn Dawn Lenz
Commissioner for Oaths
in and for the Province of Alberta
My commission expires on November 19, 2026

Frankie Deni (4518) - 11Flr

From: Jennie Buchanan <jbuchanan@lawsonlundell.com>
Sent: Wednesday, September 9, 2026 2:22 PM
To: Susy Trace; Leah Macklin; Bren Cargill
Cc: Frankie Deni
Subject: Endrum v 267 Alberta et al - draft Injunction Order
Attachments: 2026-09-09 Injunction and Preservation Order (LL prepared).DOCX; Redline - 2026-08-24 Injunction and Preservation Order (Ogilvie prepared)-31537480-v1 and 31537478_3.pdf; 2026-09-02 Ogilvie LLP - Confirming Letter to the Commercial Coordinator re full day on September 17, 2026.PDF

Importance: High

Susy, Leah, Bren:

The 10-day period for Endrum to prepare and circulate the draft of the order pursuant to Rule 9.2. Accordingly, please find attached the Respondents' draft Injunction Order.

You will see that the attached draft Injunction Order does not include a direction to the parties to commence a court process to determine whether BIA section 81 applies. The Respondents' rationale for omitting that direction is set out in my email to you on September 4 (included below). Assuming you agree with this approach and otherwise approve the draft Injunction Order, we propose addressing this omission in the cover letter to Justice Harris when submitting the Injunction Order for endorsement.

We received no Notice of Application from Endrum for an order extending the time to make a proposal or to extend the Injunction Order. On that basis, we presume that Endrum does not intend to make any applications on September 17, 2026, the date that Endrum scheduled for a full-day hearing before the Honourable Justice Neilson. This introduces a new degree of risk and uncertainty regarding the Disputed Assets that was not foreseen at the hearing of Endrum's injunction application. It is therefore imperative that the terms of the Injunction Order be settled as soon as possible to ensure that the Respondents are not inadvertently prejudiced in the event that Endrum becomes bankrupt.

As such, we ask that you advise by no later than 5:00pm tomorrow, Thursday, September 10, 2026 about whether your clients approve of or object to the attached draft Injunction Order. If we don't hear from you by then, we intend to write to Justice Harris to request an urgent appearance before her to settle and, if necessary, vary the terms of the Order.

Thank you in advance for your prompt attention to this matter.

Jennie Buchanan (she/her) | Partner
 Lawson Lundell LLP
 D 403.218.7549

From: Jennie Buchanan <jbuchanan@lawsonlundell.com>
Sent: Friday, September 4, 2026 6:01 PM
To: Susy Trace <STrace@ogilvielaw.com>; Leah Macklin <LMacklin@ogilvielaw.com>; Bren Cargill <bcargill@wittenlaw.com>
Cc: Frankie Deni <fdeni@lawsonlundell.com>

Subject: RE: IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF ENDRUM ENERGY CORP. File No. 24-3356741

Susy, Leah, Bren:

Further to the below, I am writing regarding settlement of the final terms of the Injunction Order.

As previously communicated, there are several issues that need to be addressed:

1. Reversal of any changes Endrum makes / steps Endrum takes pursuant to the Injunction Order

We understand that the Injunction Order is not intended to make any permanent changes to the status of either party's possession/control over the Disputed Assets.

While Justice Harris made clear that the Injunction Order is to include a term providing that it is without prejudice to the party's rights to assert possession or ownership over the Disputed Assets, we are concerned that such a provision will not adequately protect 267 Alberta's rights, particularly in the event that Endrum does not make a (successful) proposal.

To ensure that 267 Alberta is not prejudiced by the Injunction Order, we propose adding paragraphs to the Injunction Order that expressly provide for the reversal of any changes Endrum may make / steps Endrum may take pursuant to the Injunction Order in the event that Endrum either becomes bankrupt or does not obtain an extension of the Injunction Order.

2. Section 81 hearing

Justice Harris directed the parties to commence a court process to determine whether BIA section 81 applies to the ownership dispute between Endrum and 267 Alberta. Ogilvie LLP has reserved a full-day hearing on November 12, 2026.

We would like to discuss whether Endrum and the Proposal Trustee would consider requesting that Justice Harris' vary her direction regarding BIA section 81 on the basis that a court proceeding to determine the application of that section may be practically moot if Endrum fails to make a proposal before October 7, 2026.

3. Timing of Section 81 hearing (if any)

If Endrum and the Proposal Trustee are not prepared to consider requesting that Justice Harris' guidance to vary her direction regarding BIA section 81, then we will need to resolve how the ownership dispute will be address in any proposal that Endrum may make.

4. Section 81 timing issue – date of possession

If Endrum and the Proposal Trustee are not prepared to consider requesting that Justice Harris' guidance to vary her direction regarding BIA section 81, then we will need to resolve the applicable "date of possession" for purposes of the section 81 hearing. It is preliminary understanding that the relevant "date of possession" differs depending on whether Endrum makes a proposal or becomes bankrupt.

5. Transparency issue

My clients request that terms be added to the Injunction Order to ensure transparency with respect to the implementation and effect of the Injunction Order, including with respect to:

- Endrum's communications with contractors, suppliers, vendors, operators or third parties (including, but not limited to, SECURE, Pine Cliff, Endrum's Production Accountant) regarding the Injunction Order or Endrum's rights pursuant to the Injunction Order; and
- The extent to which Endrum has been able to haul and sell oil following the granting of the injunction (whether from the Disputed Wells or otherwise);

- The total volume of any oil that Endrum has sold from the Disputed Wells since August 28, 2026; and
- Any changes to the conclusions or information set out in Proposal Trustee's Fourth Report, including (without limitation) any changes to:
 - the MAC conclusion at paras 18-20
 - the operating status of the Disputed Wells as described in paras 27-28; and
 - the Proposal Trustee's determination and comments at paras 35-36.

I am available for a further counsel if it would be useful.

Best,

Jennie Buchanan (she/her) | Partner
Lawson Lundell LLP
D 403.218.7549

From: Leah Macklin <LMacklin@ogilvie.com>

Sent: Monday, August 31, 2026 8:14 AM

To: Maria Lavelle <Maria.Lavelle@aer.ca>; Auch, Curtis J. <cauch@brownleelaw.com>; Susy Trace <STrace@ogilvie.com>; Jennie Buchanan (4549) - 11Flr <jbuchanan@lawsonlundell.com>; Bren Cargill <bcargill@wittenlaw.com>

Subject: RE: IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF ENDRUM ENERGY CORP. File No. 24-3356741

EXTERNAL EMAIL - This email was sent by a person from outside your organization.

Good morning,

Thank you for your replies.

Curtis and Maria, we will circulate the final form of order to you both once it has been settled.

Jennie, I will send out an invite for tomorrow morning at 9:30.

Bren, if that does not work for you and you wish to attend let me know and I am happy to find a new time that accommodates.

Thanks,
Leah

Leah Macklin | Lawyer



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in purpose.

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Maria Lavelle, Legal Counsel

Law Branch

e maria.lavelle@aer.ca t 403-297-3736

a Suite 1000, 250 – 5 Street SW, Calgary, AB T2P 0R4

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Curtis

**CURTIS AUCH | ASSOCIATE | BROWNLEE LLP**

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Thanks,
Leah

Leah Macklin | Lawyer

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Leah Macklin | Lawyer



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COURT FILE NUMBER 24-3356741

COURT COURT OF KING'S BENCH OF ALBERTA

JUDICIAL CENTRE EDMONTON

Clerk's Stamp

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 **INJUNCTION AND PRESERVATION
ORDER**

ADDRESS FOR SERVICE AND
CONTACT INFORMATION OF PARTY
FILING THIS DOCUMENT

OGILVIE LLP

Barristers & Solicitors
2800 Stantec Tower
10220 103 Avenue NW
Edmonton, AB T5J 0K4

Attention: Susy Trace / Leah Macklin

Phone: 780.421.1818

Fax: 780.429.4453

Email: Strace@ogilvielaw.com /
Lmacklin@ogilvielaw.com

File No.: 71423.4

DATE ON WHICH ORDER WAS PRONOUNCED:	August 24, 2026
LOCATION WHERE ORDER WAS PRONOUNCED:	Edmonton, Alberta
NAME OF JUSTICE WHO MADE THIS ORDER:	Justice L. K. Harris

UPON THE APPLICATION of the Applicant, Endrum Energy Corp. ("**Endrum**" or the "**Company**") for an injunction and preservation order (the "**Application**"); **AND UPON** considering the filed Application, the Third Affidavit of Norman Antonio Morales, sworn July 27, 2026; the Supplemental Affidavit of Norman Antonio Morales sworn July 28, 2026, the Affidavit of Firyal Hamdan sworn August 4, 2026. the Applicant's Brief filed July 31, 2026, the Affidavit of John McMahon sworn August 24, 2026, the Affidavit of Steven Oldale sworn August 6, 2026; the Brief of the Respondents, the Affidavit of Service of Firyal Hamdan dated August 10, 2026, the Brief of Law of the Alberta Energy Regulator (the "**AER**") filed August 26, 2026, the Third Report of G. Chan & Associates Inc. (the "**Proposal Trustee**") dated July 31, 2026, and the Fourth Report of the Proposal Trustee dated August 27, 2026; **AND UPON** hearing from counsel for the Company, counsel for Jake Energy Inc., 2672682

Alberta Ltd. and Brad Peake (collectively, the "**Respondents**"), counsel for the Proposal Trustee and counsel for the AER;

IT IS HEREBY ORDERED AND DECLARED THAT:

1. The Respondents, and each of them, are restrained and enjoined from:
 - a. attending or accessing the lands and well sites comprising:
 - i. Well 5-29-29-19-W4 (Crown P&NG Lease 0477070007, Twp 29, Rge 19, W4M: SW29) (the "**5-29 Well**");
 - ii. Well 6-34-35-17-W4 (Crown P&NG Lease 040484010030, Twp 35, Rge 17, W4M: Sec 34) (the "**6-34 Well**"); and
 - iii. Well 2-11-37-18-W4 (Crown P&NG Lease 040490070099, Twp 37, Rge 18, W4M: Sec 11) (the "**2-11 Well**");(collectively, the "**Disputed Assets**");
 - b. interfering in any manner with the Company's ability to protect, preserve, and operate the Disputed Assets; and
 - c. contacting or communicating with any of the Company's employees, contractors, suppliers, vendors, or operators in relation to the Disputed Assets.
2. While this Order is in effect:
 - a. Endrum is authorized and permitted to continue operating, protecting, and preserving the Disputed Assets;
 - b. Endrum is authorized to deduct from the gross revenues generated by each of the Disputed Assets the sum of \$750 per well, per month, to reimburse Endrum for its reasonable costs incurred in preserving and operating that well (the "**Preservation Costs**"), and remit the balance of such gross revenues, net of the Preservation Costs (the "**Net Revenues**"), to Ogilvie LLP, in trust;
 - c. in addition to the Preservation Costs referred to in sub-paragraph (b) above, Endrum is authorized to deduct from the gross revenues generated by each of the Disputed Assets:
 - i. the actual costs incurred by Endrum to transport oil produced from that Disputed Asset to receiving and processing facilities, including all trucking and hauling charges ("**Transportation Costs**"); and
 - ii. the reasonable costs incurred by Endrum from time to time in the maintenance, repair, and upkeep of that Disputed Asset, to the extent necessary to ensure its continued safe and

proper operation in accordance with applicable regulatory requirements ("**Maintenance Costs**");

and, for greater certainty, the "Net Revenues" to be remitted to Ogilvie LLP, in trust, pursuant to this Order shall be calculated as the gross revenues generated by each of the Disputed Assets, less the Preservation Costs less the Transportation Costs (if any) and less the Maintenance Costs (if any); and

- d. Endrum shall remit the Net Revenues to Ogilvie LLP, in trust, on a monthly basis, within ten (10) days of the end of each calendar month in which such Net Revenues are received or realized by Endrum.
3. Ogilvie LLP shall hold all Net Revenues received pursuant to the Order in trust, in an interest-bearing trust account, and not release, distribute, or otherwise deal with any such funds except pursuant to a further Order of this Honourable Court or the written agreement of the Company and the Respondents.
4. Endrum is required to maintain complete and accurate books, records, and accounts of all gross revenues generated by, and all Preservation Costs deducted in respect of, each of the Disputed Assets, and make such books, records, and accounts available for inspection by the Respondents, or their counsel, upon reasonable written request.
5. Upon final resolution of the dispute over ownership of the Disputed Assets, the Net Revenues held by Ogilvie LLP in trust, together with all interest accrued thereon, shall be distributed in accordance with the terms of the Order or written agreement resolving such dispute.
6. Subject to any further order of this Honourable Court, paragraphs 1 and 2 of this Order shall expire on, and be of no further force or effect, upon the earlier of:
 - a. September 19, 2026;
 - b. the date on which Endrum is deemed to have made an assignment into bankruptcy; and
 - c. the date Proposal Trustee makes or files a material adverse change report in respect of Endrum, in accordance with Section 50(10) of the *Bankruptcy and Insolvency Act*.
7. Upon the expiry of paragraphs 1 and 2 of this Order, any actions or changes that Endrum (or anyone acting on Endrum's behalf) makes, directs, initiates or authorizes pursuant to this Order (including, without limitation, changes to the designated operator for the 5-29 Well, the 6-34 Well or the 2-11 Well), shall be automatically reversed and, in the event that paragraphs 1 and 2 of this Order expire pursuant to either paragraph 6(b) or 6(c) of this Order, such reversal shall be deemed to take effect immediately prior to expiry.

8. Endrum (or a trustee in bankruptcy on behalf of Endrum) shall take all reasonable steps required to give effect to paragraph 7 of this Order.
9. Endrum shall maintain copies of all written communications sent (by Endrum directly or on Endrum's behalf) to Endrum's contractors, suppliers, vendors, operators or other third parties regarding this Order or Endrum's rights pursuant to this Order, together with any responses to such communications, and must disclose such written communications and responses to the Respondents, or their counsel, upon written request.
10. This Order is without prejudice to:
 - a. the Respondents' opposition to the Application and their position that they ought not be subject to any injunction; or
 - b. any party to this Application's right to assert ownership of or possession of the Disputed Assets; and

this Order may not be relied upon to support an inference of ownership or possession of the Disputed Assets.

J.C.K.B.A

COURT FILE NUMBER 24-3356741
 COURT COURT OF KING'S BENCH OF ALBERTA
 JUDICIAL CENTRE EDMONTON

Clerk's Stamp

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 **INJUNCTION AND PRESERVATION
 ORDER**

ADDRESS FOR SERVICE AND
 CONTACT INFORMATION OF PARTY
 FILING THIS DOCUMENT

OGILVIE LLP

Barristers & Solicitors
 2800 Stantec Tower
 10220 103 Avenue NW
 Edmonton, AB T5J 0K4

Attention: Susy Trace / Leah Macklin

Phone: 780.421.1818

Fax: 780.429.4453

Email: Strace@ogilvie.com /

Lmacklin@ogilvie.com

File No.: 71423.4

DATE ON WHICH ORDER WAS PRONOUNCED:	August 24, 2026
LOCATION WHERE ORDER WAS PRONOUNCED:	Edmonton, Alberta
NAME OF JUSTICE WHO MADE THIS ORDER:	Justice L. K. Harris

UPON THE APPLICATION of the Applicant, Endrum Energy Corp. ("Endrum" or the "Company") for an injunction and preservation order (the "Application"); **AND UPON** considering the filed Application, the Third Affidavit of Norman Antonio Morales, sworn July 27, 2026; the Supplemental Affidavit of Norman Antonio Morales sworn July 28, 2026, the Affidavit of Firyal Hamdan sworn August 4, 2026, the Applicant's Brief filed July 31, 2026, the Affidavit of John McMahon sworn August 24, 2026, the Affidavit of Steven Oldale sworn August 6, 2026; the Brief of the Respondents ~~and~~, the Affidavit of Service of Firyal Hamdan dated August 10, 2026, the Brief of Law of the Alberta Energy Regulator (the "AER") filed August 26, 2026, the Third Report of G. Chan & Associates Inc. (the "Proposal Trustee") dated July 31, 2026, and the Fourth Report of the Proposal Trustee dated August 27, 2026; **AND UPON** hearing ~~representation~~ from counsel for the Company, ~~and~~ counsel for ~~the~~

~~Respondents; AND UPON hearing from G. Chan & Associates Inc. (the "Proposal Trustee") and any other parties present;~~

~~IT IS HEREBY ORDERED AND DECLARED THAT:~~ 1. Jake Energy Inc., 2672682 Alberta Ltd. and Brad Peake (collectively, the "Respondents"), counsel for the Proposal Trustee and counsel for the AER;

IT IS HEREBY ORDERED AND DECLARED THAT:

1. The Respondents, and each of them, are restrained and enjoined from:

a. attending or accessing the lands and well sites comprising:

- i. Well 5-29-29-19-W4 (Crown P&NG Lease 0477070007, Twp 29, Rge 19, W4M: SW29) (the ~~"5-29"~~ "5-29 Well");
- ii. Well 6-34-35-17-W4 (Crown P&NG Lease 040484010030, Twp 35, Rge 17, W4M: Sec 34) (the ~~"6-34 Well"~~); and
- iii. Well 2-11-37-18-W4 (Crown P&NG Lease 040490070099, Twp 37, Rge 18, W4M: Sec 11) (the ~~"2-11 Well"~~);

(collectively, the "Disputed Assets");

b. interfering in any manner with the Company's ability to protect, preserve, and operate the Disputed Assets ~~pending determination of the dispute over ownership of the Disputed Assets, whether by further Order of this Honourable Court or by agreement between the parties;~~ and

c. contacting or communicating with any of the Company's employees, contractors, suppliers, vendors, or operators in relation to the Disputed Assets.

~~2. Pending the final resolution of the dispute over ownership of the Disputed Assets, whether by further Order of this Honourable Court or by written agreement between the parties~~ While this Order is in effect:

a. Endrum is authorized and permitted to continue operating, protecting, and preserving the Disputed Assets;

b. ~~in operating, protecting, and preserving the Disputed Assets,~~ Endrum is authorized to deduct from the gross revenues generated by each of the Disputed Assets the sum of \$750 per well, per month, to reimburse Endrum for its reasonable costs incurred in preserving and operating that well (the "Preservation Costs"), and remit the balance of such gross revenues, net of the Preservation Costs (the "Net Revenues"), to Ogilvie LLP, in trust;

c. in addition to the Preservation Costs referred to in sub-paragraph (b) above, Endrum is authorized to deduct from the gross revenues generated by each of the Disputed Assets:

- i. the actual costs incurred by Endrum to transport oil produced from that Disputed Asset to receiving and processing facilities, including all trucking and hauling charges ("**Transportation Costs**"); and
- ii. the reasonable costs incurred by Endrum from time to time in the maintenance, repair, and upkeep of that Disputed Asset, to the extent necessary to ensure its continued safe and proper operation in accordance with applicable regulatory requirements ("**Maintenance Costs**");

and, for greater certainty, ~~the definition of "Preservation Costs" shall be deemed to include the Transportation Costs and Maintenance Costs, and~~ the "Net Revenues" to be remitted to Ogilvie LLP, in trust, pursuant to this Order shall be calculated as the gross revenues generated by each of the Disputed Assets, less the Preservation Costs ~~(inclusive of~~ less the Transportation Costs (if any) and less the Maintenance Costs (if any); and

- d. Endrum shall remit the Net Revenues to Ogilvie LLP, in trust, on a monthly basis, within ten (10) days of the end of each calendar month in which such Net Revenues are received or realized by Endrum;

3. ~~e.~~ Ogilvie LLP shall hold all Net Revenues received pursuant to the Order in trust, in an interest-bearing trust account, and not release, distribute, or otherwise deal with any such funds except pursuant to a further Order of this Honourable Court or the written agreement of ~~all parties to this proceeding;~~ the Company and the Respondents.

4. ~~f.~~ Endrum is required to maintain complete and accurate books, records, and accounts of all gross revenues generated by, and all Preservation Costs deducted in respect of, each of the Disputed Assets, and make such books, records, and accounts available for inspection by the Respondents, or their counsel, upon reasonable written request;

5. ~~g. upon~~ Upon final resolution of the dispute over ownership of the Disputed Assets, the Net Revenues held by Ogilvie LLP in trust, together with all interest accrued thereon, shall be distributed in accordance with the terms of the Order or written agreement resolving such dispute; ~~and.~~

~~h. Endrum, its directors, officers, employees, and agents shall incur no liability as a result of any act or omission done in good faith in the operation, protection, or preservation of the Disputed Assets, or in the deduction and remittance of Preservation Costs and Net Revenues, in accordance with the terms of the Order, save and except in the case of gross negligence or wilful misconduct~~

6. Subject to any further order of this Honourable Court, paragraphs 1 and 2 of this Order shall expire on, and be of no further force or effect, upon the earlier of:
- a. September 19, 2026;
 - b. the date on which Endrum is deemed to have made an assignment into bankruptcy; and
 - c. the date Proposal Trustee makes or files a material adverse change report in respect of Endrum, in accordance with Section 50(10) of the *Bankruptcy and Insolvency Act*.
7. Upon the expiry of paragraphs 1 and 2 of this Order, any actions or changes that Endrum (or anyone acting on Endrum's behalf) makes, directs, initiates or authorizes pursuant to this Order (including, without limitation, changes to the designated operator for the 5-29 Well, the 6-34 Well or the 2-11 Well), shall be automatically reversed and, in the event that paragraphs 1 and 2 of this Order expire pursuant to either paragraph 6(b) or 6(c) of this Order, such reversal shall be deemed to take effect immediately prior to expiry.
8. Endrum (or a trustee in bankruptcy on behalf of Endrum) shall take all reasonable steps required to give effect to paragraph 7 of this Order.
9. Endrum shall maintain copies of all written communications sent (by Endrum directly or on Endrum's behalf) to Endrum's contractors, suppliers, vendors, operators or other third parties regarding this Order or Endrum's rights pursuant to this Order, together with any responses to such communications, and must disclose such written communications and responses to the Respondents, or their counsel, upon written request.
10. This Order is without prejudice to:
- a. the Respondents' opposition to the Application and their position that they ought not be subject to any injunction; or
 - b. any party to this Application's right to assert ownership of or possession of the Disputed Assets; and
- this Order may not be relied upon to support an inference of ownership or possession of the Disputed Assets.

J.C.K.B.A

Document comparison by Workshare Compare on Wednesday, September 9, 2026 2:10:33 PM

Input:	
Document 1 ID	iManage://DCIMANWORK1/Lawson/31537480/1
Description	#31537480v1<Lawson> - 2026-08-24 Injunction and Preservation Order (Ogilvie prepared)
Document 2 ID	file://C:\NRPortb\Lawson\JAB2\31537478_3.docx
Description	31537478_3
Rendering set	Standard

Legend:	
<u>Insertion</u>	
Deletion	
Moved from	
<u>Moved to</u>	
Style change	
Format change	
Moved deletion	
Inserted cell	
Deleted cell	
Moved cell	
Split/Merged cell	
Padding cell	

Statistics:	
	Count
Insertions	49
Deletions	28
Moved from	2
Moved to	2
Style changes	0
Format changes	0
Total changes	81

OUR FILE: 71423.4

September 2, 2026

REPLY TO:

LEAH MACKLIN

DIRECT LINE: (780) 429-6280
DIRECT FAX: (780) 429-4453

EMAIL: lmacklin@ogilvIELaw.com

2800 STANTEC TOWER
10220 103 AVENUE
EDMONTON AB T5J 0K4
FACSIMILE (780) 429-4453
TELEPHONE (780) 421-1818

Sent Via Email: CommercialCoordinator.KBJEdmonton@albertacourts.ca

Office of the Edmonton Commercial Coordinator
Edmonton Law Courts
1A Sir Winston Churchill Square
Edmonton, AB T5J 0R2

Dear Sir/Madame:

**Re: 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 Corporation (the "Debtor")
Court of King's Bench Edmonton Action No. 243356741
Application to be heard on: September 17th (the "Application")**

We are counsel to Endrum Energy Corp., the Debtor in this matter.

We write to confirm our request that the Application originally scheduled to be heard September 15, 2026 at 2p.m. for a 1-hour slot in front of the Honourable Justice Neilson, be rescheduled to be heard on September 17, in front of the Honourable Justice Neilson. We kindly request to book the full day on September 17, 2026.

We appreciate your assistance. Please contact our office should you require anything further.

Yours truly,

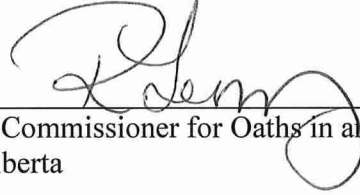
Ogilvie LLP

Per:



LEAH MACKLIN
LM/fh

This is **Exhibit 6** referred to in the
Affidavit of **Frankie Deni** affirmed
before me this 15th day of September,
2026.



A Commissioner for Oaths in and for
Alberta

Robyn Dawn Lenz
Commissioner for Oaths
in and for the Province of Alberta
My commission expires on November 19, 2026

Frankie Deni (4518) - 11Flr

From: Susy Trace <STrace@ogilvieilaw.com>
Sent: Wednesday, September 9, 2026 6:56 PM
To: Jennie Buchanan (4549) - 11Flr; Leah Macklin; Bren Cargill
Cc: Frankie Deni (4518) - 11Flr; Kaitlynd Hiller
Subject: RE: Endrum v 267 Alberta et al - draft Injunction Order

EXTERNAL EMAIL - This email was sent by a person from outside your organization.

Jennie:

We write in response to your email of today's date regarding the draft Injunction Order.

Rule 9.2 / Circulation of the Form of Order

We take issue with the suggestion that Endrum is offside Rule 9.2 for failing to circulate the form of order within 10 days. As you will recall, on the telephone call of September 1, 2026, it was agreed that you and Bren would work together to propose wording to address your concern that, in the event of a bankruptcy, the trustee would work to ensure Jake Energy is put back into the position it would have been but for the injunction. Our understanding was that once you and Bren had agreed on wording, you would advise us and we would then circulate the form of order.

We were therefore surprised to be accused of non-compliance with Rule 9.2 in circumstances where we were awaiting the outcome of your discussions with Bren. If you intended to rely strictly on the Rule 9.2 timeline, it was incumbent upon you, given the agreement reached on the September 1 call, to advise us that we should no longer wait for you and Bren to settle on wording. Nothing in your September 4 email indicated that you and Bren were no longer working together to agree on that language.

Section 81

We disagree with the Respondents' approach to section 81. Justice Harris expressly directed the parties to commence a court process to determine the application of section 81, and we do not wish to waste estate resources relitigating what is, in our respectful submission, a settled issue.

With respect to the relevant date of possession, we consider that this issue is overemphasised. It can readily be addressed by agreeing that the relevant date of possession is the date of the filing of the Notice of Intention for proposal purposes and the date of bankruptcy for bankruptcy purposes. It would be improper for the Respondents to take any steps to add to the indicia of possession from and after the date of the NOI, and certainly from and after the date of the Injunction Order. Moreover, as there is no practical window between the end of the NOI proceedings and the commencement of a bankruptcy, this argument is, with respect, a red herring since regardless of whether the proceedings continue under the NOI process or transition to a bankruptcy, an operating stay of proceedings is in effect. It would therefore be improper for anyone to be removing property from the estate during this time.

Proposal Trustee

We have not yet heard from the Proposal Trustee in respect of a number of the changes proposed in your correspondence. As several of those proposed changes directly involve the Proposal Trustee, the form of order cannot be finalized until we have received the Proposal Trustee's comments.

September 17, 2026 Hearing

Your assumption that Endrum does not intend to bring any applications on September 17, 2026 is incorrect. We would ask that you refrain from making presumptions about our client's intentions and instead simply inquire. We will be filing and serving our application materials tomorrow.

We wish to explain the reason for the timing of our filing. We have recently learned that Pat Pearce made a change at Petrinex on behalf of both Endrum and Jake Energy, designating Jake Energy as the operator of record at Petrinex. We have been attempting to obtain information from Ms. Pearce regarding this Petrinex change since last week. In our view, Ms. Pearce has been, at best, maliciously compliant and, at worst, obstructive in our efforts to determine when, why, and under whose direction she made this change. This significantly slowed our progress, as Ms. Pearce was the only person at Endrum with log-in credentials at Petrinex until yesterday. This is also very concerning given your client's emphasis on the importance of this designation at Petrinex.

In light of the timing of our filing, we would have no concerns should the Respondents wish to file any responsive materials on Monday or Tuesday of next week.

We will review the Respondents' draft Injunction Order and revert with our substantive comments in due course.

Regards,

Susy

Susy Trace | Partner



2800 Stantec Tower | 10220 103 Avenue | Edmonton, AB T5J 0K4 | www.ogilvielaw.com
Direct: (780) 429-6246 | Fax: (780) 429-4453 | Main: (780) 421-1818 | Email: STrace@ogilvielaw.ca

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From: Jennie Buchanan <jbuchanan@lawsonlundell.com>

Sent: September 9, 2026 2:22 PM

To: Susy Trace <STrace@ogilvielaw.com>; Leah Macklin <LMacklin@ogilvielaw.com>; Bren Cargill <bcargill@wittenlaw.com>

Cc: Frankie Deni <fdeni@lawsonlundell.com>

Subject: Endrum v 267 Alberta et al - draft Injunction Order

Importance: High

Susy, Leah, Bren:

The 10-day period for Endrum to prepare and circulate the draft of the order pursuant to Rule 9.2. Accordingly, please find attached the Respondents' draft Injunction Order.

You will see that the attached draft Injunction Order does not include a direction to the parties to commence a court process to determine whether BIA section 81 applies. The Respondents' rationale for omitting that direction

is set out in my email to you on September 4 (included below). Assuming you agree with this approach and otherwise approve the draft Injunction Order, we propose addressing this omission in the cover letter to Justice Harris when submitting the Injunction Order for endorsement.

We received no Notice of Application from Endrum for an order extending the time to make a proposal or to extend the Injunction Order. On that basis, we presume that Endrum does not intend to make any applications on September 17, 2026, the date that Endrum scheduled for a full-day hearing before the Honourable Justice Neilson. This introduces a new degree of risk and uncertainty regarding the Disputed Assets that was not foreseen at the hearing of Endrum's injunction application. It is therefore imperative that the terms of the Injunction Order be settled as soon as possible to ensure that the Respondents are not inadvertently prejudiced in the event that Endrum becomes bankrupt.

As such, we ask that you advise by no later than 5:00pm tomorrow, Thursday, September 10, 2026 about whether your clients approve of or object to the attached draft Injunction Order. If we don't hear from you by then, we intend to write to Justice Harris to request an urgent appearance before her to settle and, if necessary, vary the terms of the Order.

Thank you in advance for your prompt attention to this matter.

Jennie Buchanan (she/her) | Partner
Lawson Lundell LLP
D 403.218.7549

From: Jennie Buchanan <jbuchanan@lawsonlundell.com>
Sent: Friday, September 4, 2026 6:01 PM
To: Susy Trace <STrace@ogilvielaw.com>; Leah Macklin <LMacklin@ogilvielaw.com>; Bren Cargill <bcargill@wittenlaw.com>
Cc: Frankie Deni <fdeni@lawsonlundell.com>
Subject: RE: IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF ENDRUM ENERGY CORP. File No. 24-3356741

Susy, Leah, Bren:

Further to the below, I am writing regarding settlement of the final terms of the Injunction Order.

As previously communicated, there are several issues that need to be addressed:

1. Reversal of any changes Endrum makes / steps Endrum takes pursuant to the Injunction Order

We understand that the Injunction Order is not intended to make any permanent changes to the status of either party's possession/control over the Disputed Assets.

While Justice Harris made clear that the Injunction Order is to include a term providing that it is without prejudice to the party's rights to assert possession or ownership over the Disputed Assets, we are concerned that such a provision will not adequately protect 267 Alberta's rights, particularly in the event that Endrum does not make a (successful) proposal.

To ensure that 267 Alberta is not prejudiced by the Injunction Order, we propose adding paragraphs to the Injunction Order that expressly provide for the reversal of any changes Endrum may make / steps Endrum may take pursuant to the Injunction Order in the event that Endrum either becomes bankrupt or does not obtain an extension of the Injunction Order.

2. Section 81 hearing

Justice Harris directed the parties to commence a court process to determine whether BIA section 81 applies to the ownership dispute between Endrum and 267 Alberta. Ogilvie LLP has reserved a full-day hearing on November 12, 2026.

We would like to discuss whether Endrum and the Proposal Trustee would consider requesting that Justice Harris' vary her direction regarding BIA section 81 on the basis that a court proceeding to determine the application of that section may be practically moot if Endrum fails to make a proposal before October 7, 2026.

3. Timing of Section 81 hearing (if any)

If Endrum and the Proposal Trustee are not prepared to consider requesting that Justice Harris' guidance to vary her direction regarding BIA section 81, then we will need to resolve how the ownership dispute will be address in any proposal that Endrum may make.

4. Section 81 timing issue – date of possession

If Endrum and the Proposal Trustee are not prepared to consider requesting that Justice Harris' guidance to vary her direction regarding BIA section 81, then we will need to resolve the applicable "date of possession" for purposes of the section 81 hearing. It is preliminary understanding that the relevant "date of possession" differs depending on whether Endrum makes a proposal or becomes bankrupt.

5. Transparency issue

My clients request that terms be added to the Injunction Order to ensure transparency with respect to the implementation and effect of the Injunction Order, including with respect to:

- Endrum's communications with contractors, suppliers, vendors, operators or third parties (including, but not limited to, SECURE, Pine Cliff, Endrum's Production Accountant) regarding the Injunction Order or Endrum's rights pursuant to the Injunction Order; and
- The extent to which Endrum has been able to haul and sell oil following the granting of the injunction (whether from the Disputed Wells or otherwise);
- The total volume of any oil that Endrum has sold from the Disputed Wells since August 28, 2026; and
- Any changes to the conclusions or information set out in Proposal Trustee's Fourth Report, including (without limitation) any changes to:
 - the MAC conclusion at paras 18-20
 - the operating status of the Disputed Wells as described in paras 27-28; and
 - the Proposal Trustee's determination and comments at paras 35-36.

I am available for a further counsel if it would be useful.

Best,

Jennie Buchanan (she/her) | Partner
Lawson Lundell LLP
D 403.218.7549

From: Leah Macklin <LMacklin@ogilvielaw.com>

Sent: Monday, August 31, 2026 8:14 AM

To: Maria Lavelle <Maria.Lavelle@aer.ca>; Auch, Curtis J. <cauch@brownleelaw.com>; Susy Trace <STrace@ogilvielaw.com>; Jennie Buchanan (4549) - 11Flr <jbuchanan@lawsonlundell.com>; Bren Cargill <bcargill@wittenlaw.com>

Subject: RE: IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF ENDRUM ENERGY CORP. File No. 24-3356741

EXTERNAL EMAIL - This email was sent by a person from outside your organization.

Good morning,

Thank you for your replies.

Curtis and Maria, we will circulate the final form of order to you both once it has been settled.

Jennie, I will send out an invite for tomorrow morning at 9:30.

Bren, if that does not work for you and you wish to attend let me know and I am happy to find a new time that accommodates.

Thanks,
Leah

Leah Macklin | Lawyer



Together
in purpose.

2800 Stantec Tower | 10220 103 Avenue | Edmonton, AB T5J 0K4 | www.ogilvIELaw.com
Direct: (780) 429-6280 | Fax: (780) 429-4453 | Main: (780) 421-1818 | Email: LMacklin@ogilvIELaw.com



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From: Maria Lavelle <Maria.Lavelle@aer.ca>

Sent: August 31, 2026 8:06 AM

To: Auch, Curtis J. <cauch@brownleelaw.com>; Leah Macklin <LMacklin@ogilvIELaw.com>; Susy Trace <STrace@ogilvIELaw.com>; Jennie Buchanan <jbuchanan@lawsonlundell.com>; Bren Cargill <bcargill@wittenlaw.com>

Subject: RE: IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF ENDRUM ENERGY CORP. File No. 24-3356741

Thanks. I also will not be attending. But would similarly appreciate the final form of order. Regards,

Maria Lavelle, Legal Counsel

Law Branch

e maria.lavelle@aer.ca t 403-297-3736

a Suite 1000, 250 – 5 Street SW, Calgary, AB T2P 0R4

inquiries 1-855-297-8311 24-hour emergency 1-800-222-6514



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Security Classification: Protected A

From: Auch, Curtis J. <cauch@brownleelaw.com>

Sent: August 30, 2026 9:29 PM

To: Leah Macklin <LMacklin@ogilvielaw.com>; Susy Trace <STrace@ogilvielaw.com>; Jennie Buchanan <jbuchanan@lawsonlundell.com>; Bren Cargill <bcargill@wittenlaw.com>; Maria Lavelle <Maria.Lavelle@aer.ca>

Subject: RE: IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF ENDRUM ENERGY CORP. File No. 24-3356741

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Hi Leah,

I don't see a need for my attendance, but I'd ask that the final form of the order be sent to us, for our records.

Thanks,

Curtis



CURTIS AUCH | ASSOCIATE | BROWNLEE LLP

MUNICIPAL AND UTILITY REGULATION

m. 403-232-8300 | d. 403-260-1474 | f. 403-232-8408 | cauch@brownleelaw.com

SUITE 1500 | 530 - 8 AVENUE SW | CALGARY, AB T2P 3S8

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From: Leah Macklin <LMacklin@ogilvielaw.com>

Sent: Sunday, August 30, 2026 12:40 PM

To: Susy Trace <STrace@ogilvielaw.com>; Jennie Buchanan <jbuchanan@lawsonlundell.com>; Auch, Curtis J. <cauch@brownleelaw.com>; Bren Cargill <bcargill@wittenlaw.com>; Maria Lavelle <Maria.Lavelle@aer.ca>

Subject: RE: IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF ENDRUM ENERGY CORP. File No. 24-3356741

Thank you, is anyone else planning on attending?

Thanks,
Leah

Leah Macklin | Lawyer



Together in purpose. 2800 Stantec Tower | 10220 103 Avenue | Edmonton, AB T5J 0K4 | www.ogilvielaw.com
Direct: (780) 429-6280 | Fax: (780) 429-4453 | Main: (780) 421-1818 | Email: LMacklin@ogilvielaw.com



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From: Susy Trace <STrace@ogilvielaw.com>

Sent: August 30, 2026 11:20 AM

To: Jennie Buchanan <jbuchanan@lawsonlundell.com>; Leah Macklin <LMacklin@ogilvielaw.com>; Auch, Curtis J. <cauch@brownleelaw.com>; Bren Cargill <bcargill@wittenlaw.com>; Maria Lavelle <Maria.Lavelle@aer.ca>

Subject: RE: IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF ENDRUM ENERGY CORP. File No. 24-3356741

Hi everyone, I can do Tuesday morning or any time Wednesday afternoon. I am not available on Thursday.

Thank you,

Susy

From: Jennie Buchanan <jbuchanan@lawsonlundell.com>

Sent: August 28, 2026 4:49 PM

To: Leah Macklin <LMacklin@ogilvielaw.com>; Susy Trace <STrace@ogilvielaw.com>; Auch, Curtis J. <cauch@brownleelaw.com>; Bren Cargill <bcargill@wittenlaw.com>; Maria Lavelle <Maria.Lavelle@aer.ca>

Subject: RE: IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF ENDRUM ENERGY CORP. File No. 24-3356741

Thanks for reaching out, Leah.

My availability:

- Tuesday, September 1: 930am-1130am; 3pm-430pm
- Wednesday, September 2: 2pm-430pm
- Thursday, September 3: 230pm-4pm

Jennie Buchanan (she/her) | Partner
Lawson Lundell LLP
D 403.218.7549

From: Leah Macklin <LMacklin@ogilvielaw.com>

Sent: Friday, August 28, 2026 3:23 PM

To: Susy Trace <STrace@ogilvielaw.com>; Auch, Curtis J. <cauch@brownleelaw.com>; Jennie Buchanan (4549) - 11Flr <jbuchanan@lawsonlundell.com>; Bren Cargill <bcargill@wittenlaw.com>; Maria Lavelle <Maria.Lavelle@aer.ca>

Subject: IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF ENDRUM ENERGY CORP. File No. 24-3356741

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Good afternoon,

Further to court this morning, we are writing to schedule a Teams meeting to settle the minutes of the order. The court directed that all counsel present this morning may participate in settling the minutes. If you would like to take part, please send us your availability for next week. We are available Monday afternoon but can find additional time throughout the week if you are not available.

Thanks,
Leah

Leah Macklin | Lawyer



Together
in purpose.

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Direct: (780) 429-6280 | Fax: (780) 429-4453 | Main: (780) 421-1818 | Email: LMacklin@ogilvielaw.com



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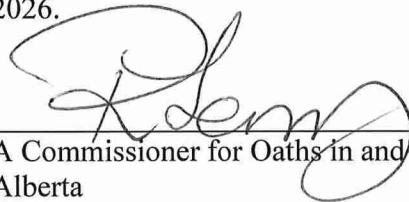
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This is **Exhibit 7** referred to in the
Affidavit of **Frankie Deni** affirmed
before me this 15th day of September,
2026.



A Commissioner for Oaths in and for
Alberta

Robyn Dawn Lenz
Commissioner for Oaths
in and for the Province of Alberta
My commission expires on November 19, 2026

Frankie Deni (4518) - 11Flr

From: Frankie Deni (4518) - 11Flr
Sent: Monday, September 14, 2026 4:05 PM
To: Susy Trace; Leah Macklin; Bren Cargill
Cc: Jennie Buchanan (4549) - 11Flr
Subject: Ownership Dispute between 2672682 Alberta Ltd. and Endrum Energy Corp
Attachments: 2026-09-14 Letter to Endrum's Counsel and Proposal Trustee.PDF

Tracking:	Recipient	Delivery
	Susy Trace	
	Leah Macklin	
	Bren Cargill	
	Jennie Buchanan (4549) - 11Flr	Delivered: 9/14/2026 4:05 PM
	Dispute with Endrum Energy Corp_-_119661_195145_	
	_Email	

Good afternoon,

Please see the attached correspondence sent on behalf of Ms. Jennie Buchanan.

Kind regards,



FRANKIE DENI (she/her) | Legal Assistant
 D 403.218.7518 | E fdeni@lawsonlundell.com
LAWSON LUNDELL LLP Suite 1100, 225 - 6th Avenue S.W., Brookfield Place, Calgary, AB T2P 1N2
 Vancouver | Calgary | Yellowknife | Kelowna



Suite 1100 Brookfield Place
225-6th Avenue S.W.
Calgary, Alberta
T2P 1N2
T: 403.269.6900

September 14, 2026

DELIVERED VIA EMAIL

WITH PREJUDICE

STrace@ogilvielaw.com
LMacklin@ogilvielaw.com

Ogilvie LLP
2800 Stantec Tower
10220 103 Avenue NW
Edmonton, AB T5J 0K4

Attention: Susy Trace and Leah Macklin

bcargill@wittenlaw.com

Witten LLP
2500, 10303 Jasper Ave
Edmonton, AB T5J 1Y5

Attention: Bren Cargill

RE: Ownership Dispute between 2672682 Alberta Ltd. (“267 Alberta”) and Endrum Energy Corp (“Endrum”)

As you know, we represent 267 Alberta. On September 9, 2026, we delivered to you our proposed draft order arising from Justice Harris’ August 28, 2026 decision granting an injunction and preservation order (the **Injunction Order**) against 267 Alberta, Jake Energy Inc. (**Jake Energy**) and Brad Peake (**Mr. Peake**). To date, we have received no substantive response from either of your offices. Our clients reserve the right to seek an appearance before Justice Harris to settle the terms of the Injunction Order.

It appears that there may be some confusion on Endrum’s part about which of our clients claim an interest in the Disputed Assets. For example, paragraph 81 of Endrum’s September 10, 2026 Bench Brief states: “The Respondents’ [i.e., 267 Alberta, Jake Energy and Mr. Peake] claim to the Disputed Assets rests entirely on the Transfer Documents.” To be clear, neither Jake Energy nor Mr. Peake claim any direct or indirect interest in the Disputed Assets. The ownership dispute underpinning Endrum’s applications for injunctive relief is strictly between Endrum and 267 Alberta.

267 Alberta maintains that it validly acquired the 5-29 Assets effective February 1, 2026 and acquired the 6-34 Assets and 2-11 Assets effective April 1, 2026. 267 Alberta understands that the ultimate question of whether it or Endrum owns the Disputed Assets will need to be resolved by the Court of King’s Bench of Alberta. We presume that Endrum also understands that this ultimate question is yet to be determined by the Court. As you know, 267 Alberta and Jake Energy (in its capacity as 267 Alberta’s financial operator) have previously expressed a willingness to agree to an arrangement with Endrum that would ensure any revenue from the sale of oil produced from the Disputed Assets would be paid into a trust account pending resolution of the ownership dispute

between 267 Alberta. That remains true today. As such, 267 Alberta and Jake Energy continue to believe that an injunction order is neither necessary nor appropriate. However, in the interest of avoiding the time and expense associated with a further contested hearing, 267 Alberta and Jake Energy propose entering into a Consent Order with the following terms, which are intended to preserve the *status quo* and without prejudicing either of 267 Alberta's and Endrum's position in future Court proceedings to determine ownership of the Disputed Assets:

1. 267 Alberta and Jake Energy will not (and will take all reasonable steps to ensure that their representatives do not) interfere with Endrum's ability to fulfill its obligations as licensee of record for the Disputed Assets.
2. Endrum will refrain from changing the identity of the designated operator in Petrinex for the Disputed Assets.
3. Endrum will oversee the contract operators for the Disputed Assets and will arrange transportation of oil produced from the Disputed Wells for processing.
4. All revenue from the sale of oil from the Disputed Assets will be deposited in Ogilvie LLP's trust account, less the following amounts:
 - (a) \$750 per month per well to pay contract operators, which will be paid directly to the contract operators; and
 - (b) Transportation costs actually incurred to transport oil to receiving and processing facilities, which will be paid directly to the companies Endrum hires to transport oil.
5. The Consent Order will remain in effect until the earlier of:
 - (a) The date Endrum is deemed bankrupt;
 - (b) November 12, 2026; or
 - (c) An agreement is reached between 267 Alberta and Endrum resolving the ownership dispute.
6. Each of 267 Alberta, Jake Energy and Endrum will take all reasonable steps to ensure that their representatives refrain from making any statements that prejudice the other party's claim to ownership or possession of the Disputed Assets when communicating with third parties about the Disputed Assets.
7. The Consent Order will be without prejudice to either 267 Alberta's or Endrum's ability to assert ownership or possession of the Disputed Assets and shall not be used to support an inference that the other party owns the Disputed Assets or has possession of the Disputed Assets (including for purposes of determining whether section 81 of the *Bankruptcy and Insolvency Act* applies).
8. Any party may apply to the Court at any time to vary or discharge the Consent Order on no less than 24 hours' notice to the responding party's counsel.

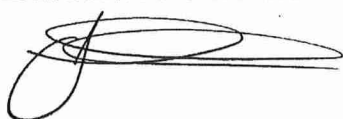
If Endrum (or the Proposal Trustee) has concerns about the above-proposed terms, or considers that additional or different terms are necessary, 267 Alberta and Jake Energy are prepared to consider and discuss reasonable modifications.

We acknowledge that the above proposal does not specifically reference Mr. Peake. As explained in the August 6, 2026 Affidavit of Steven Oldale and above, Mr. Peake does not claim any direct or indirect interest in the Disputed Assets. We understand that Endrum has sought an injunction order against Mr. Peake personally because of the report Mr. Peake made to the RCMP in May 2026 and the email that Mr. Peake sent to Dave Young on June 10, 2026. The email chain on which Endrum has relied (Exhibit T to the Third Morales Affidavit) leaves no doubt that Mr. Peake was acting on behalf of 267 Alberta and Jake Energy and not in his personal capacity when he made the RCMP report and emailed Mr. Young. The same is true with respect to Mr. Peake's attendance at the 5-29 wellsite on July 13, 2026 (the date on which he affixed a padlock to the electrical box). As such, Mr. Peake objects to Endrum's persisting in seeking injunctive relief against him personally. The above-proposed terms that will (if accepted) bind 267 Alberta and Jake Energy will achieve the outcome that we presume Endrum seeks vis-à-vis Mr. Peake.

If the parties are unable to reach an agreement for a Consent Order, then we intend to rely on this letter at the hearing of Endrum's application to extend the Injunction Order scheduled for September 17, 2026.

Yours very truly,

LAWSON LUNDELL LLP

A handwritten signature in black ink, appearing to read 'Jennie Buchanan', with a large, stylized loop at the end.

Jennie Buchanan
JAB2/frd
Encl.