

Clerk's stamp

COURT FILE NUMBER 2001-06194
COURT COURT OF QUEEN'S BENCH OF ALBERTA
JUDICIAL CENTRE CALGARY

IN THE MATTER OF THE *COMPANIES'*
CREDITORS ARRANGEMENT ACT, R.S.C. 1985,
c C-36 as amended

AND IN THE MATTER OF THE COMPROMISE OR
ARRANGEMENT OF REDROCK CAMPS INC.,
SOCKEYE ENTERPRISES INC., SWEETWATER
HOSPITALITY INC. and BALDR CONSTRCUTION
MANAGEMENT INC.

APPLICANT INVICO DIVERSIFIED INCOME L.P. and INVICO
TRADE CAPITAL L.P.

RESPONDENTS REDROCK CAMPS INC., SOCKEYE
ENTERPRISES INC., SWEETWATER
HOSPITALITY INC. and BALDR CONSTRUCTION
MANAGEMENT INC.

DOCUMENT **APPLICATION**

ADDRESS FOR SERVICE AND
CONTACT INFORMATION OF
PARTY FILING THIS
DOCUMENT

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NOTICE TO RESPONDENTS (SERVICE LIST APPENDED AS SCHEDULE "A"):

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

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

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

Date: May 13, 2021
Time: 10:00 am
Where: WEBEX
Before Whom: The Honourable Justice M.J. Lema

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

Remedy Claimed or Sought:

1. An Order abridging the time for service of notice of this Application and deeming service of this notice of Application and materials in support thereof good, valid, timely and sufficient.
2. An Order substantially in the form attached hereto as **Schedule "B"** seeking, among other things, the following:
 - a. approval of the Monitor's fees and disbursements, including the fees of its legal counsel, MLT Aikins LLP;
 - b. approval of the consolidated final Statement of Receipts and Disbursements in respect of the trust accounts maintained by the Monitor;
 - c. approval of the distribution of any remaining or residual funds to the Interim Lender; and
 - d. approval of the termination of the within CCAA Proceedings (as defined below).as recommended by BDO Canada Limited, as the monitor ("**BDO**" or the "**Monitor**") in the within CCAA proceedings (the "**CCAA Proceedings**").
3. An Order granting such other and further relief as the circumstances may require and as this Honourable Court shall deem appropriate.

Grounds for Making the Application:

Procedural History

4. On May 13, 2020, Invico Diversified Income L.P. ("**IDILP**") and Invico Capital Trade L.P. (together referred to as "**Invico**"), made an application (the "**Initial Application**") to the Court of Queen's Bench of Alberta (the "**Court**") for an order granting an initial stay of proceedings in respect of Redrock Camps Inc. ("**Redrock**"), Sockeye Enterprises Inc. ("**Sockeye**"), Sweetwater Hospitality Inc. ("**Sweetwater**") and Baldr Management Inc. ("**Baldr**") (collectively referred to as the "**Redrock Group**" or the "**Company**") pursuant to the *Companies' Creditors Arrangement Act*, RSC 1985 c C-36, as amended (the "**CCAA**").

5. On May 13, 2020 (the “**Filing Date**”), a CCAA Initial Order was granted by the Honourable Madam Justice B. E. C. Romaine of the Court providing initial relief, including, but not limited to, imposing an initial stay of proceedings (the “**Stay**”) in favour of the Redrock Group and its assets through to May 25, 2020.
6. On the Filing Date, the Court appointed BDO as the Monitor in the CCAA Proceedings.
7. On May 22, 2020, the Monitor filed a report to the Court (the “**First Report**”) in advance of the Company’s May 25, 2020 Court application (the “**Comeback Application**”).
8. At the Comeback Application, the Court granted an Amended and Restated CCAA Initial Order (the “**ARIO**”), which included certain relief, *inter alia*:
 - a. an extension of the Stay through to July 24, 2020;
 - b. the approval of a \$2,500,000 interim credit facility (the “**Interim Facility**”) from IDILP (the “**Interim Lender**”) pursuant to an Amended and Restated Interim Financing Agreement between the Company and IDILP (the “**Interim Financing Agreement**”);
 - c. the approval of a super-priority afforded to the Administration Charge, the Interim Lender’s Charge and the Director’s Charge as against the property, assets and undertakings of the Redrock Group (the “**Assets**”) as follows:
 - i. Administration Charge (\$500,000) – first ranking;
 - ii. Interim Lender’s Charge (\$2,500,000) – second ranking; and
 - iii. Directors’ Charge (\$400,000) – third ranking.
 - d. providing the Monitor with authority to exercise control over the Redrock Group’s bank accounts and its receipts; and
 - e. providing the Monitor with the authority, in consultation with Invico and the Redrock Group, to prepare, supervise and control a sale and investor and solicitation process (the “**SISP**”).
9. On July 10, 2020, the Monitor filed a report (the “**Second Report**”) in contemplation of applications by:

- a. Invico seeking to further extend the Stay and to expand the Monitor’s powers to contemplate the execution of any sale or investment agreements resulting from the SISP (collectively referred to as “**Definitive Agreements**”); and
 - b. the Monitor seeking approval of the SISP as proposed by the Monitor, the engagement of a sales advisor to administer the SISP (the “**Sale Advisor**”) and the establishment of a charge on the assets of the Redrock Group to secure the amount of the fees payable to the Sale Advisor (the “**Sale Advisor Charge**”).
10. At a hearing on July 14, 2020, the Court granted two Orders as follows:
- a. an Order further extending the Stay to September 30, 2020 and extending the Monitor’s powers to include the execution of Definitive Agreements; and
 - b. an Order approving:
 - i. the engagement of KPMG Corporate Finance Inc. as the Sale Advisor;
 - ii. approving the SISP; and
 - iii. establishing the Sale Advisor Charge.
11. On September 11, 2020, the Monitor prepared a report (the “**Third Report**”) and an accompanying confidential supplemental report (the “**Confidential Supplement to the Third Report**”) in advance of applications by:
- a. Invico seeking to further extend the Stay and to increase the borrowing limit under the Interim Facility and the Interim Lender’s Charge from \$2.5 Million to \$3.0 Million; and
 - b. the Monitor seeking approval of a sale approval and vesting order in respect of the sale of substantially all of the assets, property and undertaking of Sockeye (the “**Sockeye Transaction**”) to Invico, or its nominee (the “**Sockeye Purchaser**”), and the sealing of the Confidential Supplement to the Third Report.
12. On September 15, 2020, the Court granted two orders as follows:
- a. an Order:

- i. further extending the Stay to November 27, 2020;
 - ii. increasing the borrowing limit under the Interim Facility and the Interim Lender's Charge to \$3.0 Million;
 - iii. extending the Termination Date (as defined in the Interim Financing Agreement); and
 - iv. authorizing the Monitor to execute any necessary amendments to the Interim Financing Agreement.
- b. an Order:
 - i. approving the Sockeye Transaction subject to reviewing the finalized purchase and sale agreement; and
 - ii. sealing the Confidential Supplement to the Third Report until the earlier of 6 months after the Monitor files its certificate of discharge in the CCAA Proceedings or May 31, 2021.
- 13. On October 7, 2020, the Monitor prepared a report (the "**Fourth Report**") in advance of Invico's application seeking the appointment of a Chief Restructuring Officer ("**CRO**") in respect of Redrock and Sockeye and for the granting of authority for the Monitor to execute an agreement in relation thereto on behalf of Redrock and Sockeye.
- 14. On October 9, 2020, the Court granted an Order:
 - a. appointing Mr. David Hawkins as the CRO; and
 - b. authorizing the Monitor to execute the proposed CRO engagement letter on behalf of Redrock and Sockeye.
- 15. On November 20, 2020, the Monitor prepared a report (the "**Fifth Report**") in advance of Invico's application to further extend the Stay and the Termination Date of the Interim Financing Agreement to February 12, 2021.
- 16. On November 26, 2020, the Court granted an Order extending each of the Stay and the Termination Date to February 12, 2021.

17. On January 27, 2021, the Monitor prepared a report (the “**Sixth Report**”) and a confidential supplement to the Sixth Report (the “**Confidential Supplement to the Sixth Report**”) in contemplation of applications by:
- a. The Monitor seeking:
 - i. a sale approval and vesting order (the “**Redrock SAVO**”) in respect of the sale of substantially all of the assets, property and undertakings of Redrock (the “**Redrock Transaction**”, and together with the Sockeye Transaction, the “**Transactions**”) to Invico or its nominees, Invico Holdings Canada Inc and Redrock Camps LP (“**RC LP**”) (collectively referred to as the “**Redrock Purchaser**”, and together with the Sockeye Purchaser, the “**Purchasers**”), by its general partner Redrock Camps GP Ltd. (“**RC GP**”);
 - ii. a reverse vesting order transferring, assigning and vesting all “Excluded Assets” and “Excluded Liabilities” (each as defined in the Redrock PSA) to Baldr (the “**RVO**”); and
 - iii. a sealing Order in respect of the Confidential Supplement to the Sixth Report (the “**Sixth Confidential Supplement Sealing Order**”).
 - b. Redrock, RC GP and RC LP seeking an order (the “**Plan Sanction Order**”) sanctioning a joint Plan of Arrangement (the “**Plan of Arrangement**”) under the CCAA and the *Alberta Business Corporations Act*, RSA 2000, c B-9, as amended; and
 - c. Invico seeking to further extend the Stay through to March 31, 2021.
18. On February 8, 2021 (the “**February 8th Application**”), the Court granted the following Orders:
- a. an Order extending the Stay through to March 31, 2021; and
 - b. an Order establishing procedures to address the repossession of certain Redrock assets in conjunction with the claim of Jonk Farms Ltd. as against Redrock.

19. The remaining matters sought at the February 8th Application, being the Redrock SAVO, the RVO and the Plan Sanction Order, were adjourned and set down to be heard on February 18, 2021.
20. On February 18, 2021, the Court granted the following Orders:
 - a. the Redrock SAVO;
 - b. the RVO;
 - c. the Plan Sanction Order; and
 - d. the Sixth Confidential Supplement Sealing Order.
21. On February 12, 2021, the Monitor filed a report (the “**Seventh Report**”) in respect of the Monitor’s application for advice and direction in relation to various claims advanced by the former President of the Redrock Group, Mr. Troy Ferguson (the “**Ferguson Claims**”).
22. On March 12, 2021, the Court granted an Order rendering a decision in respect of the priority and treatment of the Ferguson Claims.
23. On March 26, 2021, the Monitor prepared a report (the “**Eighth Report**”) in advance of Invico’s application seeking to further extend the Stay to May 14, 2021.
24. On March 29, 2021, the Court granted an Order extending the Stay through to May 14, 2021.

The Transactions

25. As set out in the Ninth Report of the Monitor, to be filed concurrently herewith (the “**Ninth Report**”), the Monitor, the Sockeye Purchaser and the Redrock Purchaser have now closed the Transactions and the respective operations have been fully transitioned to the care and custody of the Purchasers. This includes the ongoing collection of any accounts receivable that remained owing to Redrock or Sockeye.

Approval of the Monitor's Activities and Approval of Fees

26. The First Report, Second Report, Third Report, Fourth Report, Fifth Report, Sixth Report, Seventh Report, Eighth Report and Ninth Report (collectively, the "**Reports**") set out the activities and conduct of the Monitor throughout the within CCAA Proceedings.
27. Pursuant to paragraph 31 of the ARIO, the Monitor and its legal counsel are required to pass their accounts from time to time. Paragraphs 32 to 35 of the Ninth Report summarize the Monitor's legal fees and the Monitor's professional fees (the "**Professional Accounts**") incurred throughout the within CCAA Proceedings, and which are reasonable in the circumstances.

Discharge of the Monitor and Termination of the CCAA Proceedings

28. The proceeds from the Transaction will be insufficient to fully satisfy the outstanding indebtedness owed by Redrock Group to Invico, the primary secured creditor. As such, Invico and the Purchasers were the only parties contemplated as "Affected Creditors" by the Plan of Arrangement.
29. After the satisfaction of the Professional Accounts, the Monitor proposes to pay the remaining proceeds from the Transaction to Invico in its capacity as Interim Lender and in partial satisfaction of the priority charge granted to the Interim Lender.
30. As set out more fully in the Reports, the Monitor has, to date, completed its duties pursuant to the CCAA. Upon the Monitor completing all remaining steps required to complete the CCAA Proceedings, as will be evidenced by the Monitor filing a certificate certifying the same, it will be appropriate to discharge and release the Monitor from any claims, and terminate the within CCAA Proceedings.
31. The Monitor relies on such further and other grounds as counsel may advise and this Honourable Court may permit.

Material or Evidence To Be Relied Upon:

- (a) This Notice of Application, filed;
- (b) The Ninth Report of the Monitor dated May 5, 2021;

- (c) The First Report, Second Report, Third Report, Fourth Report, Fifth Report, Sixth Report, Seventh Report and Eighth Report, previously filed;
- (d) The Affidavit of Service of Joy Mutuku, to be filed;
- (e) The inherent jurisdiction of this Honourable Court to control its own process; and
- (f) Such further and other material as counsel may advise and this Honourable Court may permit.

Applicable Rules:

- (a) Rules 11.27 and 13.5 and Part 6, Division 4 of the Alberta *Rules of Court*.

Applicable Acts and Regulations:

- (a) *Companies' Creditors Arrangement Act*, RSC, 1985, c C-36.

How the Application is Proposed to be Heard or Considered:

- (a) Before the Honourable Justice M.J. Lema via Webex

WARNING TO THE RESPONDENTS:

If you do not come to Court either in person or by your lawyer, the Court may give the applicant(s) what they want in your absence. You will be bound by any order that the Court makes. If you want to take part in this application, you or your lawyer must attend in Court on the date and at the time shown at the beginning of the form. If you intend to rely on an affidavit or other evidence when the application is heard or considered, you must reply by giving reasonable notice of the material to the applicant.

SCHEDULE "A"
SERVICE LIST

COURT FILE NO.: 2001-06194

COURT COURT OF QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE CALGARY

PROCEEDINGS IN THE MATTER OF THE COMPANIES' CREDITORS
ARRANGEMENT ACT, RSC 1985, c C-36, as amended

AND IN THE MATTER OF THE COMPROMISE OR
ARRANGEMENT OF REDROCK CAMPS INC., SOCKEYE
ENTERPRISES INC., SWEETWATER HOSPITALITY INC.
and BALDR CONSTRUCTION MANAGEMENT INC.

APPLICANT BDO CANADA LIMITED IN ITS CAPACITY AS THE
COURT-APPOINTED MONITOR OF REDROCK CAMPS
INC., SOCKEYE ENTERPRISES INC., SWEETWATER
HOSPITALITY INC. and BALDR CONSTRUCTION
MANAGEMENT INC.

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(Updated May 6, 2021)**

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<p>Bank of Montreal 9th Floor, 350 – 7th Avenue S.W. Calgary, AB T2P 3N9</p> <p>Attention: Sandy Hayer, Senior Manager Phone: 403-503-7499 E-mail: sandy.hayer@bmo.com CLST.RegistryConfirmations@bmo.com</p>	
<p>Calmont Leasing Ltd. 14610 Yellowhead Trail Edmonton, AB T5L 3C5 Fax: 780-451-5768</p> <p>Attention: Caitlin Schulte Email: Caitlin.Schulte@calmont.ca</p>	

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<p>G.N. Johnston Equipment Co. Ltd. 5990 Avebury Road Mississauga, ON L5R 3R2</p> <p>Attention: Sherry Wright Email: liz.robertson@johnstoneequipment.com Elton.nesturi@johnstoneequipment.com</p>	

PARTY	RELATIONSHIP
<p>Redrock Camps Inc. c/o Registered Office 302, 322 – 11 Avenue Calgary, Alberta T2R 0C5</p> <p>Email: tferguson@redrockgroup.ca</p>	
<p>PACIFIC INSOLVENCY CENTRE / CRA Surrey National Verification & Collection Centre Canada Revenue Agency 9755 King George Boulevard Surrey, BC V3T 5E1 Fax:</p> <p>MINISTRY OF THE ATTORNEY GENERAL Legal Services Branch Justice, Health and Revenue Group</p> <p>Phone: 250-886-0587</p> <p>Attention: Cindy Cheuk Email: Cindy.Cheuk@gov.bc.ca</p> <p>Attention: Isabel Gowda Email: Isabel.Gowda@gov.bc.ca</p> <p>Attention: Leila Ramage Email: Leila.Ramage@gov.bc.ca</p> <p>Attention: Carmen Saldivia Email: Carmen.Saldivia@gov.bc.ca</p>	<p>Legal Counsel</p>
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<p>TC Energy (TransCanada Pipelines Limited) c/o Head Office 450 – 1st Street S.W. Calgary, Alberta T2P 5H1</p> <p>Attention: Bernie O'Dwyer TransCanada Pipelines Limited Accounts Payable Department PO Box 1000, Station M Calgary AB T2P 4K5 Email: ap_invoices_calgary@tcenergy.com Email: Samantha_campbell@tcenergy.com</p> <p>Lesley Lee 450 – 1st Street S.W. Calgary, Alberta T2P 5H1 Email: lesley_lee@tcenergy.com</p> <p>Tricia Oshiro 450 – 1st Street S.W. Calgary, Alberta T2P 5H1 Email: tricia_oshiro@tcenergy.com</p>	<p>Purchase Order No.4500320641</p> <p>Purchase Order No.4500326614</p> <p>Primary Attorney for TransCanada Pipelines Limited</p>

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<p>Nova Gas Transmission Ltd. c/o Registered Office 450 – 1 Street S.W. Calgary, Alberta T2P 5H1</p> <p>Attention: Varinder Chaudhary Email: vic_chaudhary@transcanada.com Telephone: 403.920.7790 Fax: 403.920.2200</p> <p>Attention: Shayne Beattie Telephone: 587.933.4131 Email: shayne_beattie@transcanada.com</p>	<p>Services Agreement No.4600008704</p> <p>Field Services and/or Small Construction Services Agreement No. CW2246793</p>
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<p>Gordon Food Service 2999 James Snow Parkway North Milton, Ontario L9T 5G4</p> <p>Attention: Jennifer Heeringa Email: jennifer.heeringa@gfs.com</p> <p>Attention: Joel White Email: joel.white@gfs.com</p> <p>Attention: Dian Wenzel Email: dian.wenzel@gfs.com</p>	

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<p>Black Diamond Limited Partnership by way of its general partner Black Diamond Group Inc. 440 2nd Ave SW Calgary AB T2P 5E9</p> <p>Attention: Mike Ridley Fax: 403.264.9281 Email: mridley@blackdiamondgroup.com</p> <p>Copy: Legal Department Fax: 1.403.237.6421</p>	<p>Catering Services Agreement SO#18-009</p>
<p>Penn West Petroleum & Farm Kitchens Inc. Erikson National Energy Inc. 1900, 717-7th Avenue SW Calgary, Alberta T2P 0Z3</p>	<p>Master Services Agreement</p>
<p>Hudson Bay Mining and Smelting Co. Limited #1 Company Road PO Box 1500 Flin Flon Manitoba Canada R6A 1N9</p>	<p>Service/Rental Requisition Number 39796</p>

PARTY	RELATIONSHIP
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<p>Her Majesty the Queen in Right of Alberta Alberta Agriculture and Forestry High Level Forest Area Box 900 High Level, Alberta T0H 1Z0</p> <p>Attention: Alanna Carlson Fax: 780.926.5433</p> <p>Attention: Natasha Sutherland Email: Natasha.Sutherland@gov.ab.ca</p>	<p>Contract Number 21HFD710</p> <p>Contract Number 21HFD719</p>
<p>Her Majesty the Queen in Right of Alberta Alberta Agriculture and Forestry High Level Forest Area Box 900 High Level, Alberta T0H 1Z0</p> <p>Attention: Contract Management Email: aep.finance-hlvl@gov.ab.ca Fax: 780.926.4224</p> <p>Attention: Natasha Sutherland Email: Natasha.Sutherland@gov.ab.ca</p>	<p>Contract Number 21HFD800</p>
<p>Her Majesty the Queen in Right of Alberta Alberta Agriculture and Forestry Fort McMurray Forest Area Box 300, 9915 Franklin Avenue 5th Floor Fort McMurray, Alberta T9H 2K4</p> <p>Attention: Philip Haggis Email: aep.finance-fmm@gov.ab.ca Phone: 780.742.7339</p> <p>Attention: Natasha Sutherland Email: Natasha.Sutherland@gov.ab.ca</p>	<p>Contract Number 21MFD002</p> <p>Contract Number 21MFD003</p>

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<p>Her Majesty the Queen in Right of Alberta Alberta Agriculture and Forestry 8660 Bears paw Dam Rd NW Calgary, AB T3L 1S4</p> <p>Attention: Marc Gamache Fax: 403.297.8803</p> <p>Attention: Natasha Sutherland Email: Natasha.Sutherland@gov.ab.ca</p>	<p>Contract Number 21CFD611</p>
<p>Her Majesty the Queen in Right of Alberta Alberta Agriculture and Forestry Rocky Forest Area PO Box 1720 Rocky Mountain House, AB T4T 1B3</p> <p>Attention: Wayne Werstiuk Email: aep.finance-rmh@gov.ab.ca Phone: 403.845.8272</p> <p>Attention: Natasha Sutherland Email: Natasha.Sutherland@gov.ab.ca</p>	<p>Contract Number 21RFD009</p> <p>Contract Number 21RFD010</p>
<p>Malbeck Corp Contact name: Malcolm Huycke 1919 10A Street SW, Calgary AB, T2T 3K2 403-228-4456 Email: mmhuycke@gmail.com</p>	<p>Temp Land Use Agreement</p>
<p>Black Diamond Camps, Div of 440 2 Ave SW Suite 1000 Calgary, AB, T2P 5E9 Canada (403) 206-4747</p> <p>Attention: Chris Rowe crowe@boxxmodular.com</p>	<p>Rental Agreement</p>

PARTY	RELATIONSHIP
<p>Canfor 9401 – 108 Street, Postal Bag 100, Grand Prairie, AB, T8V 3A3 Phone: 780-538-7749 Fax: 780-538-7800</p> <p>Attention : Jordanna Lorencz Email : Jordanna.lorencz@canfor.com</p>	<p>RUA 180030</p>
<p>Peyto Exploration & Development Corp. Suite 300, 600 3rd Ave SW Calgary AB, T2P 0G5 Email: thirdpartyrequests@peyto.com</p>	<p>S1142 RUA 11S15</p>
<p>Weyerhaeuser Company Limited Suite 440-1140 West Pender Street Vancouver, BC V6E 4G1</p> <p>Email: Pembina.roadandland@weyerhaeuser.com</p>	<p>Master Agreement Master RUA</p>
<p>GFS 290212 Township Road 261 Rocky View County, AB T4A 0V6 Email: cgy-info@gfs.ca</p> <p>Attention: Jennifer Heeringa Email: Jennifer.heeringa@gfs.com</p>	<p>Distribution Agreement</p>
<p>Vivienne M Ball Barrister and Solicitor Environmental Law Team, Legal Services Division Justice and Solicitor General Government of Alberta 8th Floor, Oxbridge Place 9826 - 106 Street Edmonton, AB T5K 2J6 Email: Vivienne.ball@gov.ab.ca</p>	<p>TFA-183792 TFA-185042 Department Miscellaneous Lease No.190091 Department Miscellaneous Lease No.190097</p>

PARTY	RELATIONSHIP
<p>Black Diamond Limited Partnership 1000-440 2nd Avenue SW Calgary Alberta T2P 5E9</p> <p>Attention: Mike Ridley Email: mridley@blackdiamondgroup.com</p>	<p>Equipment Lease 38 & 39 Person Dorm Rental</p> <p>Equipment Rental Lease Project/Quote Number CAB00043</p> <p>Rental and Services Contract No. ES-118935</p> <p>Equipment Lease dated March 11, 2019</p> <p>38 Person Dorm Rental Project/Quote Number CAB00034</p>
<p>G.N.S. Industrial Trailer Services Ltd. 10819 184 St Edmonton Alberta T5S 2T2</p> <p>Attention : Josh Skoreyko</p>	<p>Equipment Lease Number 1576- 2018JS</p> <p>Equipment Lease Number 1605- 2019JS</p>
<p>LodgeLink Inc. Suite 1000, 440 2nd Avenue SW Calgary, Alberta T2P 5E9</p> <p>Attention : Carla Jones</p>	<p>Supplier Master Contract No. LL- 16-107</p>
<p>Terra Water Systems 4208 118 Avenue SE Calgary Alberta T2Z 4A4</p> <p>Attention : Ross McTavish</p>	<p>Equipment Rental Contract</p> <p>Equipment Rental Contract No. R- 18-005</p>
<p>Calmont Leasing Ltd. 14610 Yellowhead Trail Edmonton Alberta T5L 3C5</p> <p>Attention: Account Manager Fax#: 780.451.5768</p>	<p>Lease Agreement Contract No. C13461</p> <p>Lease Agreement Contract No. C19531</p> <p>Lease Agreement Contract No. C19615</p> <p>Lease Agreement Contract No. C20448</p>
<p>Shred it, c/o Stericycle ULC PO Box 15781, Station A Toronto Ontario M5W 1C1</p> <p>Attention: Account Manager</p>	<p>Service Agreement Customer Number: 11319529</p>

PARTY	RELATIONSHIP
<p>Epcor Utilities Inc. 2000 10423 101 Street NW Edmonton Alberta T5H 0E8</p> <p>Attention: Account Manager</p>	<p>Service Agreement for Account Number: 27357714</p>
<p>Direct Energy LP PO Box 1515 Calgary Alberta T2P 4K2</p> <p>Attention: Account Manager</p>	<p>Service Agreement for Account Number: 760500049738</p>
<p>Canadian Linen and Uniform Box 51045, RPO Tyndall Winnipeg, Manitoba R2X 3C6</p> <p>Attention: Bruce Carter</p>	<p>Service Agreement for Customer Number 500003864 for services at 16, 12808 170 Street, Edmonton Alberta T5V 0A6</p>
<p>Workers' Compensation Board – Alberta 9912 107 Street NW Edmonton, AB T5K 1G5</p> <p>Attention: Manoj Gupta Email: manoj.gupta@wcb.ab.ca</p>	
<p>Alberta Environment and Parks Suite 1710, 639 5 Ave SW Calgary, AB T2P 0M9</p> <p>Attention: Melissa Burkett Email: Melissa.Burkett@gov.ab.ca</p> <p>Attention: Natasha Sutherland Email: Natasha.Sutherland@gov.ab.ca</p>	
<p>Blue Collar Silviculture Ltd. 244 Lear Road Quesnel BC V2J 5V5</p> <p>Attention: David Newton Email: dcnewton60@gmail.com</p> <p>Attention: Rita Rief Email: r.rief@shaw.ca</p>	

PARTY	RELATIONSHIP
<p>Subcool Mechanical Inc. Site 2 RR 1 PO Box 23 Vimy, Alberta T0G 2J0</p> <p>Attention: Bill Luczkiw Email: bill_l@subcoolmech.com</p>	

SCHEDULE "B"
PROPOSED FORM OF ORDER

COURT FILE NUMBER	2001-06194
COURT	COURT OF QUEEN'S BENCH OF ALBERTA
JUDICIAL CENTRE	CALGARY
	IN THE MATTER OF THE <i>COMPANIES' CREDITORS ARRANGEMENT ACT</i> , R.S.C. 1985, c C-36 as amended
	AND IN THE MATTER OF THE COMPROMISE OR ARRANGEMENT OF REDROCK CAMPS INC., SOCKEYE ENTERPRISES INC., SWEETWATER HOSPITALITY INC. and BALDR CONSTRUCTION MANAGEMENT INC.
APPLICANTS	INVICO DIVERSIFIED INCOME L.P. and INVICO TRADE CAPITAL L.P.
RESPONDENTS	REDROCK CAMPS INC., SOCKEYE ENTERPRISES INC., SWEETWATER HOSPITALITY INC. and BALDR CONSTRUCTION MANAGEMENT INC.
DOCUMENT	ORDER
ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT	MLT AIKINS LLP Barristers and Solicitors 2100, 222 3 rd Avenue S.W. Calgary, Alberta T2P 0B4 Phone: 403.693.5420/4347 Fax: 403.508.4349 Attention: Ryan Zahara/Catrina Webster File: 0128056.00002

DATE ON WHICH ORDER WAS PRONOUNCED: MAY 13, 2021

LOCATION OF HEARING OR TRIAL: EDMONTON, ALBERTA

NAME OF JUDGE WHO MADE THIS ORDER: HONOURABLE JUSTICE M.J. LEMA

UPON THE APPLICATION of BDO Canada Limited, filed May 5, 2021 (the "**Application**"), in its capacity as the monitor (the "**Monitor**") in the within *Companies' Creditors Arrangement Act*, RSC 1985, c C-36 ("**CCAA**") proceedings ("**CCAA Proceedings**"), for an Order approving the Monitor's fees and disbursements and termination of the within CCAA Proceedings; **AND UPON HAVING READ** the Ninth Report of the Monitor dated May 5, 2021

(the “**Monitor’s Ninth Report**”) and the Affidavit of Service of Joy Mutuku sworn May 12, 2021; **AND UPON** hearing counsel for the Monitor and all other interested parties present; **AND UPON** being satisfied that it is appropriate to do so, **IT IS ORDERED THAT**:

1. Service of notice of the Application and supporting materials is hereby declared to be good and sufficient, no other person is required to have been served with notice of the Application, and time for service of the Application is abridged to that actually given.

APPROVAL OF ACTIVITIES AND REPORTS

2. The First Report of the Monitor dated May 22, 2020, the Second Report of the Monitor dated July 10, 2020, the Third Report of the Monitor dated September 11, 2020, the Fourth Report of the Monitor dated October 7, 2020, the Fifth Report of the Monitor dated November 20, 2020, the Sixth Report of the Monitor dated January 27, 2021, the Seventh Report of the Monitor dated February 12, 2021, the Eighth Report of the Monitor dated February 12, 2021, and the Ninth Report of the Monitor dated May 5, 2021, and the activities and conduct of the Monitor as described in each such report, are hereby approved.
3. The Monitor has exercised its powers and performed its duties and functions in respect of Redrock Camps Inc., Sockeye Enterprises Inc., Sweetwater Hospitality Inc. and Baldr Construction Management Inc. (the “**Redrock Group**”), including but not limited to those under the CCAA, the Initial Order as amended and restated, and all other Orders issued in the within proceedings honestly, in good faith, and in a commercially reasonable manner.

APPROVAL OF ACTIVITIES AND REPORTS

4. The Monitor’s accounts for fees and disbursement throughout the within CCAA Proceedings, as set out in the Monitor’s Ninth Report are hereby approved without the necessity of a formal passing of accounts.
5. The accounts of the Monitor’s legal counsel, MLT Aikins LLP, for its fees and disbursements, as set out in the Monitor’s Ninth Report, are hereby approved.

6. The Monitor is authorized and directed to distribute any remaining funds remaining after distributions in paragraphs 4 and 5 above, to Invico Diversified Income L.P. and Invico Capital Trade L.P. (collectively, "**Invico**") as the first ranking secured creditors.

DISCHARGE OF THE MONITOR AND TERMINATION OF CCAA PROCEEDINGS

7. Upon the Monitor filing with the Clerk of the Court a certificate in the form attached hereto as **Schedule "A"** (the "**Monitor's Termination Certificate**") evidencing that all steps required to complete these CCAA proceedings have been completed:
 - a. the Monitor will have satisfied all of its duties and obligations pursuant to the CCAA and the Orders of the Court in respect of the CCAA Proceedings relating to the Redrock Group;
 - b. BDO Canada Limited shall be discharged as Monitor of the Redrock Group, and shall have no further duties, obligations or responsibilities as Monitor from and after such time, save and except as set out in paragraph 9 hereof;
 - c. these CCAA Proceedings will be deemed terminated without further Order of this Court;
 - d. the Monitor and its respective affiliates and officers, directors, partners, employees and agents (collectively the "**Released Parties**") shall be released and discharged from any and all claims that any person may have or be entitled to assert against the Released Parties, whether known or unknown, matured or unmatured, foreseen or unforeseen, existing or hereafter arising, based in whole or in part on any act or omission, transaction, dealing or other occurrence existing or taking place on or prior to the date of this Order in any way relating to, arising out of, or in respect of the CCAA Proceedings, or with respect to its conduct in the CCAA Proceedings (collectively, the "**Released Claims**"), and any such Released Claims are hereby released, stayed, extinguished and further barred and the Released Parties shall have no liability in respect thereof, provided that the Released Claims shall not include any

claim or liability arising out of any gross negligence or willful misconduct on the part of the Released Parties; and

- e. no action or other proceedings shall be commenced against any of the Released Parties in any way arising from or related to the CCAA Proceedings, except with prior leave of this Court on at least seven days' prior written notice to the Released Parties.
8. The Monitor shall deliver a filed copy of the Monitor's Termination Certificate to Redrock Group and to the service list maintained in the CCAA Proceedings.
9. Notwithstanding any provision of this Order and termination of the CCAA Proceedings, nothing herein shall affect, vary, derogate from, limit or amend any of the protections in favour of the Monitor at law or pursuant to the CCAA, the Initial Order, as amended and restated, or any other Order of this Court in the CCAA Proceedings.
10. Notwithstanding the discharge of BDO Canada Limited as Monitor of Redrock Group and the termination of the CCAA Proceedings upon the Monitor filing the Monitor's Termination Certificate, this Court shall remain seized of any matter arising from the CCAA Proceedings, and BDO Canada Limited shall have the authority from and after the date of this Order to apply to this Court to address matters ancillary or incidental to the CCAA Proceedings, notwithstanding the termination thereof. BDO Canada Limited is authorized to take such steps and actions as it deems necessary to address matters ancillary or incidental to its capacity as Monitor following the termination of the CCAA Proceedings, and in completing or addressing any such ancillary or incidental matters, BDO Canada Limited shall continue to have the benefit of the provisions of the CCAA and provisions of all Orders made in the CCAA Proceedings in relation to its capacity as Monitor, including all approvals, protections and stays of proceedings in favour of BDO Canada Limited in its capacity as Monitor.
11. No action or other proceedings shall be commenced against the Monitor in any way arising from or related to its capacity or conduct as Monitor, except with prior leave of this Court on Notice to the Monitor, and upon such terms as this Court may direct.

12. The Monitor is authorized to repay any remaining funds to the Invico in its capacity as the Interim Lender as a partial repayment of the Interim Lender's Charge.
13. This Order must be served only upon those interested parties attending or represented at the within application and those on the service list and service may be effected by facsimile, electronic mail, personal delivery or courier. Service is deemed to be effected the day of the transmission or delivery of such documents.

The Honourable Justice M.J. Lema
Justice of the Court of Queen's Bench of Alberta