



COURT FILE NUMBER BK NO: 25-2513592
COURT COURT OF QUEEN'S BENCH OF ALBERTA
JUDICIAL CENTRE CALGARY
PROCEEDING IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF OAN RESOURCES LTD.

DOCUMENT **APPLICATION FOR EXTENSION OF STAY**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT
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File No. 445340.000001

NOTICE TO THE ATTACHED SERVICE LIST (SCHEDULE "B")

This application is made against you or may affect you. You are a respondent, a party to this proceeding, or an interested party.

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:	July 8, 2019
Time:	2:00 PM
Where:	Calgary Courts Centre, 601 – 5 th Street SW, Calgary, AB T2P 5P7
Before Whom:	The Honourable Madam Justice B.E.C. Romaine

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. The applicant, OAN Resources Ltd. (“OAN”), seeks an Order substantially in the form attached hereto as **Schedule “A”**, which includes the following relief:
 - (a) Abridging the time for service of this Application and the supporting materials, as necessary, and deeming service thereof to be good and sufficient;
 - (b) Extending the stay of proceedings, pursuant to Section 50.4(9) of the *Bankruptcy and Insolvency Act*, R.S.C. 1985 c.B-3 (the “*BIA*”), for a further period of 45 days to August 28, 2019;
 - (c) Declaring that Crimson Oil & Gas Ltd., Highwood Oil Company Ltd. and David Hudgeon are critical suppliers to OAN (the “**Critical Suppliers**”), and that all payments made by OAN to the Critical Suppliers subsequent to the date of the NOI (as defined below) are hereby ratified and approved, and OAN is hereby authorized to continue making payments to the Critical Suppliers provided all such payments are first approved by the Proposal Trustee; and
 - (d) Granting such further and other relief as counsel may advise and this Honourable Court deems appropriate in the circumstances.

GROUND FOR MAKING THIS APPLICATION:

The Extension of the Stay of Proceedings

2. OAN is an insolvent corporation, which filed a Notice of Intention to make a Proposal on June 14, 2019 (the “**NOI**”).
3. OAN requires an extension of the stay of proceedings in order to continue with its financial restructuring with a view to ultimately making a proposal to its creditors.
4. The extension of the stay of proceedings is appropriate because:
 - (a) OAN has acted, and is acting, in good faith and with due diligence;
 - (b) OAN anticipates it will be able to make a viable proposal if the extension it is applying for is granted; and
 - (c) no creditor will materially be prejudiced if the extension OAN is applying for is granted.
5. The Proposal Trustee supports an extension of the stay of proceedings.

Critical Suppliers

6. Crimson Oil & Gas Ltd., Highwood Oil Company Ltd. and David Hudgeon are suppliers to OAN for services critical to the continued business of OAN. Failure by OAN to continue to honour its contractual obligations to the Critical Suppliers will cause disruption of OAN's business and future revenue streams, and threaten a successful restructuring.

MATERIAL OR EVIDENCE TO BE RELIED ON:

7. Affidavit of David Fricker sworn June 28, 2019 and filed.
8. The First Report of the Proposal Trustee, filed.
9. Such further and other materials as counsel may advise and this Honourable Court deems fit.

APPLICABLE RULES:

10. The *Alberta Rules of Court*, AR 124/2010.
11. The *Bankruptcy and Insolvency General Rules*, CRC, c 368.
12. Such further and other rules as counsel may advise and this Honourable Court may permit.

APPLICABLE ACTS AND REGULATIONS:

13. *Bankruptcy and Insolvency Act*, RSC 1985, c. B-3, as amended.
14. Such further and other Acts or regulations as counsel may advise and this Honourable Court may permit.

ANY IRREGULARITY COMPLAINED OF OR OBJECTION RELIED ON:

15. None.

HOW THE APPLICATION IS PROPOSED TO BE HEARD OR CONSIDERED:

16. In person with some or all of the parties' present.

WARNING:

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

Schedule "A"

Form of Order

See attached.

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DOCUMENT

ORDER

ADDRESS FOR SERVICE AND
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Josef G.A. Kruger, Q.C. / Jack R. Maslen
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File No. 445340.000001

DATE ON WHICH ORDER WAS PRONOUNCED: July 8, 2019

NAME OF JUSTICE WHO MADE THE ORDER: The Honourable Madam Justice B.E.C.
Romaine

UPON the Application of OAN Resources Ltd. ("OAN"); **AND UPON** having read the Affidavit of David Fricker sworn June 28, 2019 and filed, and the First Report of Hardie & Kelly Inc. in its capacity as proposal trustee (the "**Proposal Trustee**") for these proceedings, filed; **AND UPON** hearing from counsel to OAN and any other interested parties appearing at the hearing of this Application;

IT IS HEREBY ORDERED AND DECLARED THAT:

1. The time for service of this Application, together with all supporting materials, is hereby abridged, if necessary, and declared to be good and sufficient and no other Person is required to have been served with such documents, and this hearing is properly returnable before this Honourable Court today and further service thereof is hereby dispensed with.
2. The 30-day period of time within which OAN is required to file a proposal to its creditors with the Official Receiver, under Section 50.4 of the *Bankruptcy and Insolvency Act*, R.S.C. 1985 c. B-3 (the

“**BIA**”), shall be and is hereby extended by forty-five (45) days, from July 14, 2019, to and including August 28, 2019.

3. Crimson Oil & Gas Ltd., Highwood Oil Company Ltd. and David Hudgeon are declared to be critical suppliers to OAN (the “**Critical Suppliers**”), and all payments made by OAN to the Critical Suppliers subsequent to the date of the NOI are hereby ratified and approved, and OAN is hereby authorized to continue making payments to the Critical Suppliers provided all such payments are first approved by the Proposal Trustee.
4. Service of this Order shall be deemed good and sufficient by serving the same on: (i) the Persons listed on the service list (attached as **Schedule “B”** to the Application); and (ii) by posting a copy of this Order on the Proposal Trustee’s website at: <https://relieffromdebt.ca/oan-resources-ltd/>.
5. No other Persons are entitled to be served with a copy of this Order.
6. Service of this Order shall be deemed good and sufficient regardless of whether service is effected by PDF copy attached to email, facsimile, courier, personal delivery or ordinary mail.
7. The Service List attached as **Schedule “B”** to the Application is hereby approved, if necessary, notwithstanding that addresses for certain individuals (or their trusts) have not been listed by OAN due to privacy concerns. Any Person wishing to serve materials on such individuals (or their trusts) hereafter may do so by requesting that the Proposal Trustee send the materials to the individual(s) on their behalf.

Justice of the Court of Queen’s Bench of Alberta

Schedule "B"

Service List

See attached.

Blackstone Drilling Fluids Limited 1600, 510 – 5 Avenue SW Calgary, AB T2P 3S2	Bluewave Energy 219 Hwy 88 North Red Earth, AB T0G 1X0
Boss Pressure Services PO Box 1635 #5, 705 Caribou Trail SW Slave Lake, AB T0G 2A0	Burnet, Duckworth & Palmer LLP Attn: Craig O. Alcock Suite 2400, 525 – 8 Avenue SW Calgary, AB T2P 1G1 <i>(Counsel for CWC Energy Services Corp and TAM International Oil Services Ltd.)</i>
Cream Energy Group Box 7228 5602 – 58 Avenue Drayton Valley, AB T7A 1S5	Crimson Oil & Gas Ltd. Suite 800, 2424 – 4 Street SW Calgary, AB T2P 2T4
CVS Controls Ltd. 3900 – 101 Street Edmonton, AB T6E 0A5	CWC Energy Services 33 Schenk Industrial Road Sylvan Lake, AB T4S 2J9
Donald E. Siecke	Doreen Scheidt
Element Resource Development Inc. 1250 – 635 8 Avenue SW Calgary, AB T2P 3M3	Eric Tyrrell
Exact Oilfield Developing Ltd. Box 755 1412 Tamarack Rd NE Slave Lake, AB T0G 2A0	Fairfax Energy Inc. 2205, 500 – 4 th Avenue SW Calgary, AB T2P 2V6
FOWB 2022 c/o W. Brett Wilson	Fricker Enterprises Ltd. 1250 – 635 8 Avenue SW Calgary, AB T2P 3M3
Galey Inspection Services Ltd. Site 19, Box 4, RR2 Sexsmith, AB T0H 3C0	George R. Wright Holdings Ltd. 200, 80 Chippewa Road Sherwood Park, AB T8A 4W6

Hardie & Kelly Inc. Attn: Marc Kelly/Charla Smith 5800 – 2 Street SW, Suite 110 Calgary, AB T2H 0H2 <i>(Proposal Trustee)</i>	Highfire Energy Services Ltd. 22212 Twp. Rd 510 Sherwood Park, AB T8C 1G9
Highwood Oil Company Ltd. Suite 1500, 250 – 2 Street SW Calgary, AB T2P 0C1	Hudgeon's Welding Ltd. 20 Range Place NW Calgary, AB T3G 1P6
Intricate Group Inc. Suite 1650, 717 – 7 Avenue SW Calgary, AB T2P 0Z3	Iron Eagle Hot Oiling Ltd. #4 Saskatchewan Ave Devon, AB T9G 1E7
Jesse Lake Resources Ltd. Attn: Christian Buck 30 Anatapi Lane SW Calgary, AB T3H 4G4	Jesse Lake Resources Ltd. 1250 – 635 8 Avenue SW Calgary, AB T2P 3M3
John D. Wright	John K. Assman
Jordana Pine-Algar	JR's Pressure Service Box 1656 Whitcourt, AB T7S 1P4
Keith and Doris E. Minor Trust	Lavoie Holdings Ltd. Box 69 Red Earth Creek, AB T0G 1X0
Loon River Trucking Ltd. Box 189 Red Earth Creek, AB T0G 1X0	Lory Oilfield Rentals Inc. 1004 – 15 th Avenue Nisku, AB T9E 7S5
LRW 40 Trust c/o W. Brett Wilson	Lyle's Trucking Box 6962 Peace River, AB T8S 1S7
Magnum Cementing Services Operations Ltd. P.O. Box 60010 Strathmore, AB T1P 0C3	Matt Osbourn

Max Fuel Distributors Ltd. Box 236 Slave Lake, AB T0G 2A0	MD of Opportunity No. 17 Box 60 Wabasca, AB T0G 2K0
MI Casa Rentals Inc. 1170, 800 – 6 Avenue SW Calgary, AB T2P 3G3	Michael L. Horn
Newsco International Energy Services Inc. Bay 102, 85 Freeport Blvd. NE Calgary, AB T3J 4X8	Nicholas A. Sannella
Northern Waste Disposal Ltd. Box 420 Red Earth, AB T0G 1X0	Northumberland Trust Attn: John Chambers
P2 Energy Solutions Alberta ULC 1250 – 635 8 Avenue SW Calgary, AB T2P 3M3	Patmore Oilfield Services Ltd. Box 665 High Level, AB T0H 1Z0
Peer Brother Industries Inc. Box 314 Red Earth Creek, AB T0G 1X0	Performance Production Services Inc. PO Box 1333 Weyburn, SK S4H 3J9
Peter Kiss	Petrosight Inc. 900 3E8, 808 4 Avenue SW Calgary, AB T2P 0K4
Pipe Optics Integrity Solutions Inc. 71 Calling Horse Estates Calgary, AB T3Z 1X4	Pitbull Energy Services 2424 91 Avenue Edmonton, AB T6P 1K9
Quinn Pumps Canada Ltd. P.O. Box 9609, Station M Calgary, AB T2P 0E9	Rafael Ford Business Consulting 1250 – 635 8 Avenue SW Calgary, AB T2P 3M3
RBW Waste Management (Northern) Ltd. 3280 – 10 Street Nisku, AB T9E 1E7	RDW 40 Trust c/o W. Brett Wilson
Red Planet Trucking Ltd. Box 258 Red Earth Creek, AB T0G 1X0	Remote Wireline Services (2011) Ltd. 8804 – 98 Street Morinville, AB T8R 1K6

Rene LaPrade	RJB Oilfield Services Ltd. PO Box 8965 Slave Lake, AB T4S 1S6
Robert Vanderhooft	Ryder Fluid Solutions Inc. 11713 – 91B Street Grande Prairie, AB T8X 1J2
Sauve Construction Ltd. Site 3, Box 1, RR 1 Dapp, AB T0G 0S0	Savanna Drilling Corp. c/o CH3084, PO Box 2509, Station M Calgary, AB T2P 0E2
Seer Development Ltd. Attn: Paul Verhesen 1403 Woodward Crescent Edmonton, AB T6M 0A3	Sequoia Helicopters 30750 Threshold Drive Abbotsford, BC V2T 6H5
Silver Tip Enterprises Ltd. Box 1146 Rocky Mountain House, AB T4T 1A8	Silverline Wireline Box 207 Slave Lake, AB T0G 2A0
Silvertip Rentals Inc. Box 207 Slave Lake, AB T0G 2A0	Sol P. Wright
STEP Energy Services 1200, 205 – 5 Avenue SW Calgary, AB T2P 2V7	Strategic Projects Inc. Unit 1200, 700 – 9 th Avenue SW Calgary, AB T2P 3V4
Stream-Flo Industries Ltd. 4505 – 74 Avenue Edmonton, AB T6B 2H5	Synergy Land Services Ltd. 200, 2710 – 17 Avenue SE Calgary, AB T2A 0P6
TAM International Oil Services Ltd. 10341 – 50 Street SE Calgary, AB T2C 3E3	Team Industrial Services TISI Canada Inc. 2507 – 84 th Avenue Edmonton, AB T6P 1K1
Tervita Corporation 1600, 140 – 10 Avenue SE Calgary, AB T2G 0R1	Total Oilfield Rentals Ltd. Suite 2550, 300 – 5 Avenue SW Calgary, AB T2P 3C4
Trican Well Services Ltd. 645 7 Avenue SW, #2900 Calgary, AB T2P 4G8	Tryton Tool Services PO Box 10667 Lloydminster, AB T9V 3A7

Western Camp Services Ltd.
7003 – Girard Road
Edmonton, AB T6B 2C4

White Water Management Ltd.
300, 839 5 Avenue SW
Calgary, AB T2P 3C8