

COURT FILE NO. 2603-02889

COURT COURT OF KING'S BENCH OF ALBERTA

JUDICIAL CENTRE EDMONTON

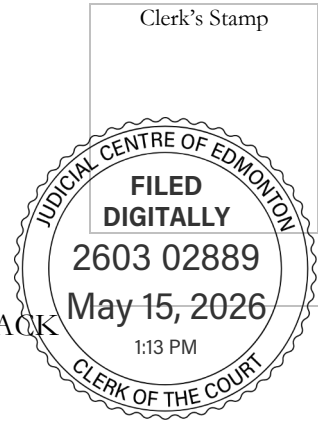
PLAINTIFF ROYAL BANK OF CANADA, as Agent

DEFENDANTS ENERGERA INC. (formerly known as FRAC SHACK INC.), ENERGERA INTERNATIONAL INC. (formerly known as FRAC SHACK INTERNATIONAL INC.), ENERGERA AMERICA INC. (formerly known as FRAC SHACK AMERICA INC.) and SANDTINEL LLC

APPLICANT ALVAREZ & MARSAL CANADA INC., in its capacity as Court-appointed Receiver and Manager of ENERGERA INC. (formerly known as FRAC SHACK INC.), ENERGERA INTERNATIONAL INC. (formerly known as FRAC SHACK INTERNATIONAL INC.), ENERGERA AMERICA INC. (formerly known as FRAC SHACK AMERICA INC.) and SANDTINEL LLC

DOCUMENT **APPLICATION
(Order for Approval of Sale Process, Stalking Horse Bid, and the Actions, Conduct, Fees and Disbursements of the Receiver, and Restricted Court Access Order)**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT
 Torys LLP
 4600 Eighth Avenue Place East
 525 - Eighth Ave SW
 Calgary, AB T2P 1G1
 Attention: Kyle Kashuba
 Telephone No.: 403.776.3744
 Fax No.: 403.776.3800
 File No.: 39108-2014



NOTICE TO RESPONDENT(S):

This Application is made against you. You are a Respondent.

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

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

Date:	Monday, May 25, 2026
Time:	10:00 a.m.
Where:	Calgary Courts Centre, via Webex videoconference (See Schedule “A”)
Before Whom:	The Honourable Justice G.S. Dunlop

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. Alvarez & Marsal Canada Inc., in its capacity as Court-appointed receiver and manager (the “**Receiver**”) of the assets, undertakings and properties (the “**Property**”) of Energera Inc. (formerly known as Frac Shack Inc.), Energera International Inc. (formerly known as Frac Shack International Inc.), Energera America Inc. (formerly known as Frac Shack America Inc.) and Sandtinel LLC (collectively, the “**Companies**” or the “**Debtors**”), seeks an Order substantially in the form attached as **Schedule “C”** to this Application:
 - (a) declaring that the time for service of the within Application and supporting materials be abridged if necessary, that the Application is properly returnable on the scheduled date and that service of the Application on the Service List attached hereto as **Schedule “B”** is validated and deemed to be good and sufficient, and that further service of the Application be dispensed with;
 - (b) approving the proposed Sale Process (“**Sale Process**”), as set out and described in the First Report of the Receiver, dated May 15, 2026 (the “**First Report**”), and a supplemental report to the First Report, to be filed (the “**Supplemental Report**”);
 - (c) authorizing and directing the Receiver to do all things reasonably necessary or desirable to give full effect to the Sale Process and to perform its respective obligations thereunder;
 - (d) authorizing the Receiver to enter into the Auction and Liquidation Services Agreement (the “**Auction Services Agreement**”) with McDougall Auctioneers Ltd. (the “**Stalking Horse Bidder**” or the “**Auctioneer**”) dated May 15, 2026, in respect of

certain assets (the “**Assets**”) of the Debtors, which will serve as a Stalking Horse Bid under the Sale Process, as set out and described in the First Report;

- (e) authorizing the payment of a Break Fee (as defined in the Sale Process) to the Stalking Horse Bidder should the Stalking Horse Bidder not be the Successful Bidder (as defined in the Sale Process);
 - (f) approving the actions, conduct and activities of the Receiver to date in respect of the administration of the Debtors’ receivership estate, and those of the Receiver’s legal counsel, as set out and reported in the First Report; and
 - (g) granting leave to the Receiver to apply or reapply to this or any court or administrative body in any province of Canada for advice, assistance and directions as may be necessary to carry out the terms of the Order sought.
2. A Restricted Court Access Order in substantially the same form as that attached as **Schedule “D”** (the “**Restricted Court Access Order**”) to this Application, providing the following relief:
- (a) directing the limited sealing of Confidential Appendix 1 to the First Report, and Confidential Appendix 1 to the Supplemental Report (together, the “**Confidential Appendices**”).
3. Such further and other relief, advice and directions as counsel may advise and this Honourable Court may deem just and appropriate.

Grounds for making this Application:

Approval of Sale Process and Auction Services Agreement

- 4. Pursuant to a Receivership Order granted on March 17, 2026 (the “**Receivership Order**”), the Receiver was appointed as the receiver and manager of the Property of the Debtors and was tasked with amongst other things, identifying, securing, arranging for sale and monetizing the Property the Debtors.
- 5. Pursuant to the terms of the Receivership Order, and in particular subparagraph 3(k) thereof, the Receiver is empowered and authorized to market any or all of the Debtors’ Property,

including advertising and soliciting offers in respect of the Debtors' Property or any part or parts thereof and negotiating such terms and conditions of sale as the Receiver, in its discretion, may deem appropriate.

6. Pursuant to subparagraph 3(l) of the Receivership Order, the Receiver is empowered and authorized to sell, convey, transfer, lease or assign the Debtors' Property or any part or parts thereof out of the ordinary course of business, with or without approval of the Court, dependent on whether certain monetary thresholds are met.
7. The Receiver has structured and proposed a sale process (the "**Sale Process**"), under which the Property will be marketed by the Receiver to a number of interested prospective purchasers.
8. As part of the Sale Process, the Receiver has entered into the Auction Services Agreement, which is subject to the approval of this Honourable Court. The Auction Services Agreement is intended to serve as the Stalking Horse Bid, as defined and described in the First Report.
9. The marketing process that has been proposed by the Receiver and as set out and described under the Sale Process is in the best interest of the Companies' stakeholders, and in the opinion of the Receiver, is more advantageous to the Companies' stakeholders than an alternate form of the marketing and ultimate disposition of the Companies' Property.
10. The process leading up to the execution of the Auction Services Agreement was reasonable in all of the circumstances and the consideration to be received is fair and reasonable.
11. It would be prejudicial to the Companies' stakeholders and the administration of the receivership estate if the Sale Process is not completed.
12. The equitable jurisdiction of this Honourable Court is applicable and provides the basis for the Relief sought by the Receiver.

Actions, Conduct, Fees and Disbursements of the Receiver

13. All of the actions, activities and conduct of the Receiver during the course of the administration of the within proceedings as reported in the First Report, including with respect to the Sale Process, are reasonable and necessary, and have been validly undertaken in

connection with the conduct of the Receiver's obligations herein in relation to the Debtors' Property.

14. The fees and disbursements of the Receiver, those of the Receiver's Canadian legal counsel, and those of the Receiver's US legal counsel, as reported in the First Report, have been reasonable, appropriate, and necessarily incurred in the course of these receivership proceedings.
15. Royal Bank of Canada, as administrative agent for a syndicate of lenders, as the secured creditors of the Debtors, supports the Application of the Receiver.
16. The terms as set out in the proposed form of Order attached hereto as Schedule "C" are necessary to approve the Sale Process and the Auction Services Agreement, as drafted and negotiated by the Receiver.
17. Such further and other grounds as counsel may advise and this Honourable Court may permit.

Restricted Court Access Order

18. The Confidential Appendices contain information and opinions of the Receiver, and are of a sensitive commercial nature, in that they include the purchase price allocation in respect of the Assets agreed to in the Auction Services Agreement and details of the assessment and valuation of the Stalking Horse Bid (the "**Confidential Information**").
19. The publication or dissemination of the Confidential Information could result in prejudice to the sale of the Assets, and diminished recovery to the Companies' stakeholders, as it would potentially compromise the integrity of the sale process contemplated under the Sale Process.
20. The Restricted Court Access Order sought is the least restrictive and prejudicial alternative to prevent the dissemination of the commercially sensitive Confidential Information, such that is fair and just in the circumstances to restrict public access to the Confidential Information.
21. The terms as set out in the proposed form of Restricted Court Access Order attached hereto as Schedule "D" are necessary to effect the sealing of the Confidential Appendices.
22. Such further and other grounds as counsel may advise and this Honourable Court may permit.

Material or evidence to be relied on:

23. All pleadings, proceedings, orders, affidavits, reports and other materials filed in Alberta Court of King's Bench Action No. 2603-02889.
24. The First Report of the Receiver, and the Supplemental Report, to be filed.
25. The proposed form of Orders attached as Schedule "C" and Schedule "D" to this Application.
26. The inherent jurisdiction of this Honourable Court to control its own process.
27. Such further and other material and evidence as counsel may advise and this Honourable Court may permit.

Applicable Rules:

28. Rules 3.2, 6.28(b), 6.47(e) and 6.47(f) of the *Alberta Rules of Court*, Alta Reg 124/2010.
29. Such further and other Rules as counsel may advise and that this Honourable Court may permit.

Applicable Acts and Regulations:

30. *Bankruptcy and Insolvency Act*, RSC 1985, c B-3, as amended, the *Judicature Act*, RSA 2000, c J-2, as amended, and such further and other Acts and Regulations as counsel may advise and that this Honourable Court may permit.
31. Such further and other Acts and regulations as counsel may advise and this Honourable Court may permit.

Any irregularity complained of or objection relied on:

32. Not applicable.

How the Application is proposed to be heard or considered:

33. Oral submissions by counsel at an Application in Commercial List Chambers scheduled to be heard via Webex videoconference on Monday, May 25, 2026 at 10:00 a.m. before the

Honourable Justice G.S. Dunlop, of the Commercial List.

AFFIDAVIT EVIDENCE IS REQUIRED IF YOU WISH TO OBJECT.

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 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"

Webex Information

Hearing Requester

Requester

Requester	Email Address
Kyle Kashuba	kkashuba@torys.com

Responsible lawyer

Law Firm	Responsible lawyer	Email Address
Torys LLP	Kyle Kashuba	kkashuba@torys.com

Hearing Details

ROYAL BANK OF CANADA as Agent v. ENERGERA INC. (formerly known as FRAC SHACK INC.), et al

Justice	Hearing time (duration)	Contested
Justice DUNLOP	10:00 AM - 11:00 AM (60 minutes) View in calendar	No

Hearing method	Video conference
Video Conference	https://albertacourts.webex.com/meet/virtual.courtroom86

Hearing requirements	Other
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SCHEDULE“B”

Service List

COURT FILE NUMBER 2603-02889

COURT COURT OF KING'S BENCH OF ALBERTA

JUDICIAL CENTRE EDMONTON

PLAINTIFF ROYAL BANK OF CANADA, as Agent

DEFENDANTS ENERGERA INC. (formerly known as FRAC SHACK INC.), ENERGERA INTERNATIONAL INC. (formerly known as FRAC SHACK INTERNATIONAL INC.), ENERGERA AMERICA INC. (formerly known as FRAC SHACK AMERICA INC.) and SANDTINEL LLC

APPLICANT ALVAREZ & MARSAL CANADA INC., in its capacity as Court-appointed Receiver and Manager of ENERGERA INC. (formerly known as FRAC SHACK INC.), ENERGERA INTERNATIONAL INC. (formerly known as FRAC SHACK INTERNATIONAL INC.), ENERGERA AMERICA INC. (formerly known as FRAC SHACK AMERICA INC.) and SANDTINEL LLC

DOCUMENT Service List (updated May 14, 2026)

PARTY	EMAIL ADDRESS	ROLE / INTEREST
Torys LLP Attention: Kyle Kashuba Olivier Organowski	kkashuba@torys.com oorganowski@torys.com	Counsel to the Receiver
Alvarez & Marsal Canada Inc. Attention: Orest Konowalchuk Duncan MacRae Stephen Oosterbaan	okonowalchuk@alvarezandmarsal.com dmacrae@alvarezandmarsal.com soosterbaan@alvarezandmarsal.com	The Receiver
Royal Bank of Canada, as Agent Attention: Cameron Bailey	cameron.bailey@rbc.com	Agent for a Syndicate of Lenders
Norton Rose Fulbright Canada LLP Attention: Gunnar Benediktsson Aaron Stephenson Meghan Parker	gunnar.benediktsson@nortonrosefulbright.com aaron.stephenson@nortonrosefulbright.com meghan.parker@nortonrosefulbright.com	Counsel to Royal Bank of Canada, as Agent

PARTY	EMAIL ADDRESS	ROLE / INTEREST
McDougall Auctioneers Ltd. Attention: Chad Guay	chad.g@mcdauktion.com	Proposed Stalking Horse Bidder
MLT Aikins LLP Attention: Ryan Zahara Erinn Wilson	rzahara@mltaikins.com ewilson@mltaikins.com	Counsel to McDougall Auctioneers Ltd.
Munsch Hardt Kopf & Harr, P.C. Attention: John Cornwell Alex Perez	icornwell@munsch.com arpercz@munsch.com	US Counsel to the Receiver
A&B Business Equipment	ar@abbusiness.com	Creditor
Airgas USA LLC	ww-global-remits@airgas.com	Creditor
Alaska Safety Alliance	Cari-Ann@alaskasafetyalliance.org	Creditor
American Welding & Gas, Inc.	awgar@awggases.com	Creditor
Apex Pumps LLC	rebeca@apexpumpsllc.com	Creditor
Asurint	accounting@asurint.com	Creditor
AT&T	dl-bcbilling@att.com	Creditor
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B & K Equipment LLC	gbedford@bkequipment.com	Creditor
Basin Wide Janitorial	tlc_acctserv@outlook.com	Creditor
Bill Williams Tire Center	ar@billwilliamstire.com	Creditor
CDW Direct, LLC	kwasmen@cdw.com	Creditor
Cintas Corporation	jacksonl3@cintas.com	Creditor
Comcast Business	online.communications@alerts.com cast.net	Creditor
CurbTek LLC	ar@curbtek.com	Creditor

PARTY	EMAIL ADDRESS	ROLE / INTEREST
DLH Oil and Fuel LLC	dougdhhoil@sbcglobal.net	Creditor
DNOW L.P.	ds-wilson-ar-remittance@dnow.com	Creditor
E&M Services LLC	AR@e-m-services.com	Creditor
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FedEx	customersolutions@fedex.com	Creditor
Five-O Fleet Service LLC	AR@velocityfi.com	Creditor
Ford Fleet Care	ffcadmin@ford.com	Creditor
Freedom Valve Solutions LLC	AR@freedomvalve.us	Creditor
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Gryphon Holdco LLC	dolores.garcia@gryphonesp.com	Creditor
Lodgelink Inc. Attention: Legal Dept. Nancy Garmin	ar@lodgelink.com	Creditor
Lumen	e-billing@billing.lumen.com	Creditor
McCarty Equipment Co Ltd	ghxar@ghxinc.com	Creditor
McKenzie County Water Resource District	no-reply@invoicecloud.net	Creditor
McKenzie Electric Cooperative, Inc	mckenzieelectric@smarthub.coop	Creditor
McMaster-Carr	remittance.processing@mcmaster.com	Creditor
Mercer Valve Co. Inc	accounting@mercervalve.net	Creditor
Ohio Bureau of Worker's Compensation	angela.c.12@bwc.state.oh.us	Creditor
O'Reilly Auto Parts	billingdistribution@oreillyauto.com	Creditor
Patriot Energy Solutions, LLC.	ap@patriotenergysol.com	Creditor

PARTY	EMAIL ADDRESS	ROLE / INTEREST
Permaco General Contractors	marcelr@permacogc.com	Creditor
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Rig Runner	ar@rigrunnerinc.com	Creditor
Rocky Mountain Reserve	ann.dalton@r mrbenefits.com	Creditor
Target Logistics Management LLC	creditdepart@targethospitality.com	Creditor
Team Housing Solutions	ar@teamhousing.com	Creditor
Team Professional Services, Inc.	accountsreceivable@teamprofessional.com	Creditor
TeamOne Logistics, LLC	accounting@teamonetworks.com	Creditor
Thompson Hine LLP	accounts.receivable@thompsonhine.com	Creditor
TJD Energy Services, LLC	rclark@tjdenergy.com	Creditor
Total Quality Logistics, LLC	apayments@tql.com	Creditor
Travelers CL	alix.proctor@axisinsurance.ca	Creditor
Uline	accounts.receivable@uline.com	Creditor
UltraQuip, LLC	ap@ultraquip.com	Creditor
US Bank Equipment Finance	efcustomersupport@usbank.com	Creditor
Valvoline Inc.	kelly.sturdivant@valvoline.com	Creditor
Veriforce, LLC	accounting@veriforce.com	Creditor
Verizon Wireless	communications@b2binfo.verizonwireless.com	Creditor
Wells Fargo	ricoh@onlinemyaccounts.com	Creditor
WorkWell Prevention and Care, Inc	pam.hubert@workwellpc.com	Creditor

PARTY	EMAIL ADDRESS	ROLE / INTEREST
3 Tier Land, LLC Attention: Jack Amen	jamen@amenprp.com	Creditor
Cotton Bledsoe Tighe & Dawson, PC Attention: Sarah Judge	sjudge@cbtd.com	Creditor
Energera America Inc d/b/a Frac Shack Inc. c/o Cersonsky, McAnelly & Garcia, P.C. Attention: Jacquelyn Mcanelly	imcanelly@law-cmpc.com	Creditor
Friedman Suder & Cooke Attention: Jeff Parks	Parks@fsclaw.com	Creditor
Seed IP Law Group LLP Attention: Kevan Morgan	KevanM@SeedIP.com	Creditor
CJ Holding Co c/o Phelps Dunbar LLP Attention: Ivan Rodriguez, Michael Orlando	ivan.rodriquez@phelps.com michael.orlando@phelps.com	Creditor
Alaska Fuel Distributors, Inc. dba AFD Petroleum Duane Morris LLP Attention: Thomas Sankey, Diana Sangalli	twsankey@duanemorris.com dmsangalli@duanemorris.com	Creditor
Alaska Fuel Distributors, Inc. dba AFD Petroleum Duane Morris LLP Attention: Thomas Sankey, Diana Sangalli	bgreene@duanemorris.com hengelmann@duanemorris.com	Creditor

PARTY	EMAIL ADDRESS	ROLE / INTEREST
<p>Energera America Inc d/b/a Frac Shack</p> <p>c/o Byrne Cadenas & Aris LLP</p> <p>Attention: Joseph Byrne, John Dunlap</p>	<p>ibyrne@bcallp.net jdunlap@bcallp.net</p>	<p>Creditor</p>
<p>Energera America Inc</p> <p>c/o Freeman Mathis & Gary LLP</p> <p>Attention: Harrison Yoss</p>	<p>harrison.yoss@fmglaw.com</p>	<p>Creditor</p>
<p>Grayson Mill Operating LLC</p> <p>c/o Hall Maines Lugin PC</p> <p>Attention: Matt Jett</p>	<p>mjett@hallmaineslugrin.com</p>	<p>Creditor</p>
<p>Hall Maines Lugin PLLC</p> <p>Attention: Clif Hall, Jeffrey Bentch, Tim Redden, Aaron Koenck</p>	<p>chall@hallmaineslugrin.com jbentch@hallmaineslugrin.com tredden@hallmaineslugrin.com akoenck@hallmaineslugrin.com</p>	<p>Creditor</p>
<p>Jorge Cases</p> <p>c/o The Law Office of Avid Royse Joe</p> <p>David R. Joe</p>	<p>davidroysejoe@yahoo.com</p>	<p>Creditor</p>
<p>NexTier Completion Solutions Inc. NexTier Oilfield Solutions Inc. NexTier Holding Company</p> <p>c/o Phelps Dunbar LLP</p> <p>Attention: Ivan Rodriguez, Michael Orlando</p>	<p>ivan.rodriquez@phelps.com michael.orlando@phelps.com</p>	<p>Creditor</p>
<p>Ricky St. Julien</p> <p>c/o Law Offices of Katrina S Patrick</p>	<p>katrina@voiceoftheemployees.com</p>	<p>Creditor</p>

PARTY	EMAIL ADDRESS	ROLE / INTEREST
Attention: Katrina Patrick		
Spur Energy Partners LLC c/o Lewis Brisbois Bisgaard & Smith LLP Attention: Jennifer Michel	ivan.rodriquez@phelps.com michael.orlando@phelps.com	Creditor
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Spur Energy Partners LLC c/o Wilkins PLLC Attention: Sullivan Marsters	pmomeni@munsch.com	Creditor
Munsch Hardt Kopf & Harr, PC Attention: Pooneh Momeni	fischman@fischmaniplaw.com	Creditor
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Potomac Law Group Attention: Steve Suneson	rgreenspoon@dbllawyers.com	Creditor
Dunlap Bennett & Ludwig Attention: Robert Greenspoon	alittlefield@goodwin.com	Creditor
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Kean Miller Attention: Raven Bourque	diane.damiano@unitedcorporate.com	Creditor
United Corporate Services Inc.	treas@co.mckenziecounty.net	Creditor

PARTY	EMAIL ADDRESS	ROLE / INTEREST
Attention: Diane Damiano		
McKenzie County Treasurer	pmomeni@munsch.com	Creditor

SCHEDULE "C"

**Form of proposed Order
(Approval of Sale Process, Stalking Horse Bid, and the Actions, Conduct, Fees and
Disbursements of the Receiver)**

Clerk's Stamp

COURT FILE NO. 2603-02889

COURT COURT OF KING'S BENCH OF ALBERTA

JUDICIAL CENTRE CALGARY

PLAINTIFF ROYAL BANK OF CANADA, as Agent

DEFENDANTS ENERGERA INC. (formerly known as FRAC SHACK INC.), ENERGERA INTERNATIONAL INC. (formerly known as FRAC SHACK INTERNATIONAL INC.), ENERGERA AMERICA INC. (formerly known as FRAC SHACK AMERICA INC.) and SANDTINEL LLC

APPLICANT ALVAREZ & MARSAL CANADA INC., in its capacity as Court-appointed Receiver and Manager of ENERGERA INC. (formerly known as FRAC SHACK INC.), ENERGERA INTERNATIONAL INC. (formerly known as FRAC SHACK INTERNATIONAL INC.), ENERGERA AMERICA INC. (formerly known as FRAC SHACK AMERICA INC.) and SANDTINEL LLC

DOCUMENT **ORDER**
(Approval of Sale Process, Stalking Horse Bid, and the Actions, Conduct, Fees and Disbursements of the Receiver)

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT
Torys LLP
4600 Eighth Avenue Place East
525 - Eighth Ave SW
Calgary, AB T2P 1G1

Attention: Kyle Kashuba
Telephone No.: +1 403.776.3744
Fax No.: +1 403.776.3800
File No.: 39108-2014

DATE ON WHICH ORDER WAS PRONOUNCED: May 25, 2026

NAME OF JUDGE WHO MADE THIS ORDER: The Honourable Justice G.S. Dunlop

LOCATION OF HEARING: Edmonton Courts Centre, via Webex videoconference

UPON THE APPLICATION of Alvarez & Marsal Canada Inc. in its capacity as the Court-appointed receiver and manager (the “**Receiver**”) of the assets, properties and undertakings of Energera Inc. (formerly known as Frac Shack Inc.), Energera International Inc. (formerly known as Frac Shack International Inc.), Energera America Inc. (formerly known as Frac Shack America Inc.) and Sandtinel LLC (collectively, the “**Debtors**”); **AND UPON** having read the Receivership Order granted on March 17, 2026 (the “**Receivership Order**”); **AND UPON** having read the Application filed May 15, 2026, the First Report of the Receiver dated May 15, 2026 (the “**First Report**”), and a supplemental report to the first report, to be filed (the “**Supplemental Report**”); **AND UPON** having read the Affidavit of Service of Samantha Hawley, sworn and filed May __, 2026; **AND UPON** hearing from counsel to the Receiver, counsel to Royal Bank of Canada, as administrative agent for a syndicate of lenders, and from any other interested parties who may be present; **AND UPON** it appearing that all interested and affected parties have been served with notice of this Application;

IT IS HEREBY ORDERED AND DECLARED THAT:

1. The time for service of notice of this Application is abridged to the time actually given and service of the Application and supporting materials as described in the Service Affidavit is good and sufficient, and this hearing is properly returnable before this Honourable Court today and further service thereof is hereby dispensed with.
2. Capitalized terms used and not otherwise defined in this Order shall have the meanings ascribed to them in the Receivership Order or the Sale Process, as the case may be.
3. The actions, activities and conduct of the Receiver to date, including and as reported in the First Report and the Supplemental Report, are hereby approved.
4. In particular, the Sale Process that has been proposed by the Receiver in respect of the Property of the Debtors, including the appointment of the Stalking Horse Bidder, as set out and described in the First Report and the Supplemental Report, is hereby approved. and the Receiver is hereby authorized and directed to implement the Sale Process pursuant to the terms thereof. The Receiver is hereby authorized and directed to do all things reasonably necessary or desirable to give full effect to the Sale Process and to perform its respective obligations thereunder, subject to prior approval of the Court being obtained before the

completion of any transaction pursuant to the Sale Process, including for certainty, the transaction contemplated by the Stalking Horse Bid.

5. The Auction and Liquidation Services Agreement (also referred to as the Stalking Horse Agreement), in the form attached to the Supplemental Report, is hereby approved.
6. The Break Fee is hereby approved and the Receiver is authorized and directed to pay the Break Fee as required and in the manner prescribed in the Stalking Horse Agreement.
7. In connection with the Sale Process and pursuant to section 7(3)(c) of the *Personal Information Protection and Electronic Documents Act*, SC 2000, c 5 and any similar legislation in any other applicable jurisdictions, the Receiver, and its respective representatives and advisors, is hereby authorized and permitted to disclose and transfer to Participating Bidders and their respective advisors personal information of identifiable individuals, but only to the extent required to facilitate diligence in respect of, negotiate or attempt to complete a Transaction. Each Participating Bidder to whom such personal information is disclosed shall maintain and protect the privacy of such information and limit the use of such information to its evaluation for the purpose of effecting a Transaction, and, if it does not complete a Transaction, shall return all such information to the Receiver, or, in the alternative, destroy all such information and provide confirmation of its destruction if requested by the Receiver. Any Participating Bidder with a Successful Bid shall maintain and protect the privacy of such information and, upon closing of the Transaction(s) contemplated in the Successful Bid(s), shall be entitled to use the personal information provided to it that is related to the Business and Property acquired pursuant to the Sale Process in a manner that is in all material respects identical to the prior use of such information by the Receiver, and shall return all other personal information to the Receiver, or ensure that all other personal information is destroyed and provide confirmation of its destruction if requested by the Receiver.
8. The fees and disbursements of the Receiver, those of the Receiver's Canadian legal counsel, and those of the Receiver's US legal counsel, as reported in the First Report, are hereby authorized and approved.
9. This Court hereby requests the aid and recognition of any court, tribunal, regulatory or administrative body having jurisdiction in Canada, to give effect to this Order and to assist

the Receiver and its agents in carrying out the terms of this Order. All courts, tribunals regulatory and administrative bodies are hereby respectfully requested to make such orders as to provide such assistance to the Receiver, as an officer of this Court, as may be necessary or desirable to give effect to this Order or to assist the Receiver and its agents in carrying out the terms of this Order.

10. The Receiver is at liberty to reapply for further advice, assistance and direction as may be necessary to give full force and effect to the terms of this Restricted Court Access Order.
11. Service of this Order shall be deemed good and sufficient by:
 - (a) Serving the same on:
 - (i) the persons listed on the service list created in these proceedings;
 - (ii) any other person served with notice of the application for this Order;
 - (iii) any other parties attending or represented at the application for this Order; and
 - (b) Posting a copy of this Order on the Receiver's website at:
<https://www.alvarezandmarsal.com/Energera>and service on any other person is hereby dispensed with.
12. Service of this Order may be effected by facsimile, electronic mail, personal delivery or courier. Service is deemed to be effected the next business day following transmission or delivery of this Order.

Justice of the Court of King's Bench of Alberta

SCHEDULE "D"

Form of proposed Restricted Court Access Order

Clerk's Stamp

COURT FILE NO. 2603-02889

COURT COURT OF KING'S BENCH OF ALBERTA

JUDICIAL CENTRE CALGARY

PLAINTIFF ROYAL BANK OF CANADA, as Agent

DEFENDANTS ENERGERA INC. (formerly known as FRAC SHACK INC.), ENERGERA INTERNATIONAL INC. (formerly known as FRAC SHACK INTERNATIONAL INC.), ENERGERA AMERICA INC. (formerly known as FRAC SHACK AMERICA INC.) and SANDTINEL LLC

APPLICANT ALVAREZ & MARSAL CANADA INC., in its capacity as Court-appointed Receiver and Manager of ENERGERA INC. (formerly known as FRAC SHACK INC.), ENERGERA INTERNATIONAL INC. (formerly known as FRAC SHACK INTERNATIONAL INC.), ENERGERA AMERICA INC. (formerly known as FRAC SHACK AMERICA INC.) and SANDTINEL LLC

DOCUMENT **RESTRICTED COURT ACCESS ORDER**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT

Torys LLP
4600 Eighth Avenue Place East
525 - Eighth Ave SW
Calgary, AB T2P 1G1

Attention: Kyle Kashuba
Telephone No.: +1 403.776.3744
Fax No.: +1 403.776.3800
File No.: 39108-2014

DATE ON WHICH ORDER WAS PRONOUNCED: May 25, 2026

NAME OF JUDGE WHO MADE THIS ORDER: The Honourable Justice G.S. Dunlop

LOCATION OF HEARING: Edmonton Courts Centre, via Webex videoconference

UPON THE APPLICATION of Alvarez & Marsal Canada Inc. in its capacity as the Court-appointed receiver and manager (the “**Receiver**”) of the assets, properties and undertakings of Energera Inc. (formerly known as Frac Shack Inc.), Energera International Inc. (formerly known as Frac Shack International Inc.), Energera America Inc. (formerly known as Frac Shack America Inc.) and Sandtinel LLC (collectively, the “**Debtors**”); **AND UPON** having read the Receivership Order granted on March 17, 2026; **AND UPON** having read the Application filed May 15, 2026 and the First Report of the Receiver dated May 15, 2026 (the “**First Report**”), including Confidential Appendix 1, and a supplemental report to the First Report, to be filed (the “**Supplemental Report**”), which includes Confidential Appendix 1 (together with Confidential Appendix 1 to the First Report, the “**Confidential Appendices**”); **AND UPON** having read the Affidavit of Service of Samantha Hawley, sworn and filed May __, 2026; **AND UPON** hearing from counsel to the Receiver, counsel to Royal Bank of Canada, as administrative agent for a syndicate of lenders, and from any other interested parties who may be present; **AND UPON** it appearing that all interested and affected parties have been served with notice of this Application;

IT IS HEREBY ORDERED AND DECLARED THAT:

1. The time for service of notice of this Application is abridged to the time actually given and service of the Application and supporting materials as described in the Service Affidavit is good and sufficient, and this hearing is properly returnable before this Honourable Court today and further service thereof is hereby dispensed with.
2. The Confidential Appendices shall be sealed on the Court file and shall not form part of the public record, notwithstanding Division 4, Part 6 of the *Alberta Rules of Court*.
3. The Clerk of this Honourable Court shall file the Confidential Appendices in a sealed envelope, and the Confidential Appendices and envelope shall each have attached to them to a notice that sets out the style of cause of these proceedings and states that:

THIS ENVELOPE CONTAINS CONFIDENTIAL MATERIALS FILED BY ALVAREZ & MARSAL CANADA INC., IN ITS CAPACITY AS COURT-APPOINTED RECEIVER AND MANAGER OF THE DEBTORS, WHICH IS SEALED PURSUANT TO THE RESTRICTED COURT ACCESS ORDER OF THE HONOURABLE JUSTICE G.S. DUNLOP, GRANTED MAY 25, 2026.

4. The Confidential Appendices shall be unsealed on the Court record upon the later of six months after closing of a sale(s) or transaction(s) contemplated by the Sale Process.
5. Leave is hereby granted to any person, entity or party affected by paragraphs 1 and 2 of this Restricted Court Access Order to apply to this Court for a further Order vacating, substituting, modifying, or varying the terms of this Restricted Court Access Order, with such Application to be brought on notice to the Receiver.
6. The Receiver is at liberty to reapply for further advice, assistance and direction as may be necessary to give full force and effect to the terms of this Restricted Court Access Order.
7. Service of this Order shall be deemed good and sufficient by:
 - (a) Serving the same on:
 - (i) the persons listed on the service list created in these proceedings;
 - (ii) any other person served with notice of the application for this Order;
 - (iii) any other parties attending or represented at the application for this Order; and
 - (b) Posting a copy of this Order on the Receiver's website at:
<https://www.alvarezandmarsal.com/Energera>and service on any other person is hereby dispensed with.
8. Service of this Order may be effected by facsimile, electronic mail, personal delivery or courier. Service is deemed to be effected the next business day following transmission or delivery of this Order.

Justice of the Court of King's Bench of Alberta