

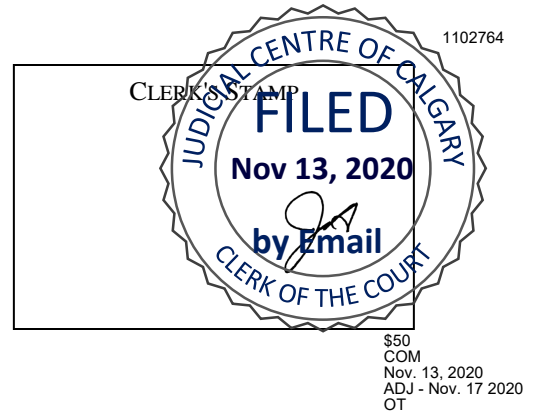


FORM 27
[RULES 6.3 AND 10.52(1)]

B201 679073

25-2679073

25-2679074



ESTATE NUMBERS

COURT

JUDICIAL CENTRE

COURT OF QUEEN'S BENCH OF ALBERTA

CALGARY

IN THE MATTER OF THE *BANKRUPTCY AND
INSOLVENCY ACT*, RSC 1985, C. B-3, AS
AMENDED

AND IN THE MATTER OF THE NOTICE OF
INTENTION TO MAKE A PROPOSAL OF
GREENFIRE HANGINGSTONE OPERATING
CORPORATION

AND IN THE MATTER OF THE NOTICE OF
INTENTION TO MAKE A PROPOSAL OF
GREENFIRE OIL & GAS LTD.

DOCUMENT

APPLICATION: SEALING

ADDRESS FOR SERVICE AND
CONTACT INFORMATION OF
PARTY FILING THIS
DOCUMENT

BENNETT JONES LLP

Barristers and Solicitors
4500 Bankers Hall East
855 – 2nd Street SW
Calgary, Alberta T2P 4K7

Attention: Kelsey Meyer / Dylan Gibbs
Telephone No.: 403-298-3323 / 403-298-3449
Fax No.: 403-265-7219
Client File No.: 87366.2

NOTICE TO RESPONDENTS: THE SERVICE LIST

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

You have the right to state your side of this matter before the master/judge.

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

Date:	Friday, November 13, 2020
Time:	10:00 a.m.
Where:	Edmonton
Before Whom:	The Honourable Mr. Justice Mah on the Commercial List

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. Warner Petroleum Corporation and Liberator Crude Trading, LLC seek an Order substantially in the form attached hereto as **Schedule "1"**:
 - (a) declaring service of this Application good and sufficient, and abridging the time for notice of this Application to the time actually given, if necessary;
 - (b) sealing Confidential Exhibit "3" on the Court's file;
 - (c) such further and other relief as Counsel may advise and this Honourable Court permits.

Grounds for making this application:

Sealing Order

2. The Confidential Exhibit "3" to the Affidavit No. 2 of Harry Warner, sworn November 12, 2020, contains confidential and commercially sensitive information which Warner is prevented from disclosing pursuant to a Non-Disclosure Agreement. Disclosure of the Confidential Exhibit could expose Warner to damages.
3. A sealing order is necessary to prevent Confidential Exhibit "3" from being disclosed. The sealing order sought is the least restrictive means possible to prevent disclosure of the confidential and commercially sensitive information in Confidential Exhibit "3".

General

4. The *Bankruptcy and Insolvency Act*, RSC 1985, c B-3, as amended, and the equitable jurisdiction of this Honourable Court.

5. Such further and other grounds as counsel may advise and this Honourable Court permits.

Material or evidence to be relied on:

6. The Affidavit No. 2 of Harry Warner, sworn November 12, 2020.
7. The pleadings previously filed in these proceedings.

Applicable rules:

8. *Alberta Rules of Court*, AR 124/2010, and in particular Rules 1.3, 3.75, 6.3, 6.4, 11.27, 11.29 and 13.5.
9. *Bankruptcy and Insolvency General Rules*, and in particular Rules 3, 6 and 11.
10. Such further and other rules as counsel may advise and this Honourable Court permits.

Applicable Acts and regulations:

11. *Bankruptcy and Insolvency Act*, RSC 1985, c B-3, as amended, and in particular Part XI thereof.
12. Such further and other acts and regulations as Counsel may advise and this Honourable Court permit.

Any irregularity complained of or objection relied on:

13. None.

How the application is proposed to be heard or considered:

14. By telephone conference call or videoconference before the Honourable Mr. Justice Mah (as scheduled with the Commercial List Coordinator).

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 "1"

CLERK'S STAMP

ESTATE NUMBERS

25-2679073
25-2679074

COURT

COURT OF QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE

CALGARY

IN THE MATTER OF THE *BANKRUPTCY AND
INSOLVENCY ACT*, RSC 1985, C. B-3, AS
AMENDED

AND IN THE MATTER OF THE NOTICE OF
INTENTION TO MAKE A PROPOSAL OF
GREENFIRE HANGINGSTONE OPERATING
CORPORATION

AND IN THE MATTER OF THE NOTICE OF
INTENTION TO MAKE A PROPOSAL OF
GREENFIRE OIL & GAS LTD.

DOCUMENT

ORDER (SEALING)

ADDRESS FOR SERVICE AND
CONTACT INFORMATION OF
PARTY FILING THIS
DOCUMENT

BENNETT JONES LLP

Barristers and Solicitors
4500 Bankers Hall East
855 – 2nd Street SW
Calgary, Alberta T2P 4K7

Attention: Kelsey Meyer / Dylan Gibbs
Telephone No.: 403-298-3323 / 403-298-3449
Fax No.: 403-265-7219
Client File No.: 87366.2

DATE ON WHICH ORDER WAS PRONOUNCED:

FRIDAY, NOVEMBER 13, 2020

LOCATION WHERE ORDER WAS PRONOUNCED:

CALGARY COURTS CENTRE

NAME OF JUSTICE WHO MADE THIS ORDER:

**THE HONOURABLE MR. JUSTICE
MAH**

UPON THE APPLICATION by Warner Petroleum Corporation and Liberator Crude Trading, LLC; **AND UPON HAVING READ** the Application of Warner Petroleum Corporation and Liberator Crude Trading LLC, dated November 12, 2020 and the Affidavit No. 2 of Harry Warner, sworn November 12, 2020; **AND UPON HEARING** the submissions of counsel for the Receiver and of other interested parties;

IT IS HEREBY ORDERED AND DECLARED THAT:

SERVICE AND NOTICE OF APPLICATION

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

SEALING OF CONFIDENTIAL EXHIBIT

2. Confidential Exhibit "3" to the Affidavit No. 2 of Harry Warner sworn November 12, 2020 shall be sealed on the Court file and shall not form part of the public record.
3. The Clerk of this Honourable Court shall file Confidential Exhibit "3" in a sealed envelope attached to a notice that sets out the style of cause of these proceedings and states that:

THIS ENVELOPE CONTAINS CONFIDENTIAL MATERIALS FILED BY
WARNER PETROLEUM CORPORATION AND LIBERATOR CRUDE
TRADING, LLC; and

THE CONFIDENTIAL MATERIALS ARE SEALED PURSUANT TO THE
SEALING ORDER ISSUED BY THE HONOURABLE MR. JUSTICE MAH
ON OR ABOUT NOVEMBER 13, 2020.

SERVICE OF ORDER

4. This Order must be served only upon those interested parties attending or represented at the within application and service may be effected by facsimile, electronic mail, personal delivery,

courier, or regular mail. Service is deemed to be effected the next business day following the transmission or delivery of such documents.

5. Service of this Order on any party not attending this application is hereby dispensed with.

Justice of the Court of Queen's Bench of Alberta