



**NOTICE OF STATEMENT OF RECEIVER**  
 (Subsections 245(1) and 246(1) of the Act)

**IN THE MATTER OF THE RECEIVERSHIP OF  
 EARTH & ENERGY CONSTRUCTION LTD.**

The receiver gives notice and declares that:

1. On June 25, 2019, the Court of Queen’s Bench of Alberta (the “**Court**”) granted an Order (the “**Receivership Order**”) pursuant to section 243(1) of the Bankruptcy and Insolvency Act, R.S.C. 1985, c. B-3 (“**BIA**”), sections 13(2) of the Judicature Act, R.S.A. 2000, cJ-2, and 49 of the Law of Property Act, R.S.A. 2000, c L-7, whereby Alvarez & Marsal Canada Inc. (“**A&M**”) was appointed receiver and manager (the “**Receiver**”), without security, of all of the current and future assets, undertakings and properties of every nature and kind whatsoever, and wherever situated, including all proceeds of Earth & Energy Construction Ltd. (“**Earth & Energy**”).
2. The Receiver understands that the accounting records for Earth and Energy as at June 25, 2019 indicates the following assets:

	<u>Estimated Net Book Value</u>	
Cash	\$	11,681
Accounts receivable		43,475
Inventories		898,640
Inter-company receivables		78,894,440
Other assets		735,963
<b>Total</b>	<b>\$</b>	<b>80,584,199</b>

**Note: realizable values may materially differ from the above estimated net book value.**

3. A&M became the Receiver in respect of the Property described above by virtue of the Receivership Order, a copy of which may be found on the Receiver’s website at: [www.alvarezandmarsal.com/voiceconstruction](http://www.alvarezandmarsal.com/voiceconstruction).
4. Upon receiving the entered Receivership Order, the Receiver took possession and control of the Property described above on June 25, 2019.
5. The following information relates to the receivership:

- a) Civic Address: 7545 52 St NW, Edmonton Alberta T6B 2G2
- b) Principal line of business: Earth and Energy’s principal business activity is the construction and maintenance of oil and gas facilities and associated projects.
- c) Location of business: Edmonton, Alberta



6. Amounts owed by the Debtor to each creditor, according to books and records as at June 25, 2019 are shown below:

	<u>Outstanding Amount</u>
Unsecured creditors (see attached listing)	\$ 77,117,890
Secured creditors (see attached listing)	35,920,510
<b>Total</b>	<b><u>\$ 113,038,400</u></b>

7. The Receiver's contact information is:

Alvarez & Marsal Canada Inc.  
Suite 1110, 250 6<sup>th</sup> Ave SW  
Calgary, AB T2P 3H7  
Telephone: (403) 538-7535  
Facsimile: (403) 538-7551

Attention: Mr. Bryan Krol  
Email: [bkrol@alvarezandmarsal.com](mailto:bkrol@alvarezandmarsal.com)

Attention: Mr. Steven Chu  
Email: [steven.chu@alvarezandmarsal.com](mailto:steven.chu@alvarezandmarsal.com)

8. To date, no claims procedure has been approved by the Court that instructs the creditors to prove their claims against the Debtor. As a result, creditors are not required to file a proof of claim with the Receiver at this time. The Receiver will notify each known creditor if a claims procedure order has been granted by the Court that instructs creditors to prove their claim(s).

Dated at Calgary, Alberta this 4<sup>th</sup> day of July, 2019.

**Alvarez & Marsal Canada Inc., in its capacity as  
the Court Appointed Receiver of  
Earth & Energy Construction Ltd., and not in its  
personal or corporate capacity**

Orest Konowalchuk, CPA, CA, CIRP, LIT  
Senior Vice President

Enclosure

**IN THE MATTER OF THE RECEIVERSHIP OF  
Earth & Energy Construction Ltd.  
(the "Debtor")**

*Preliminary List of Creditors as at June 25, 2019, as submitted by the Debtor without Admission as to any Liabilities or Privilege Herein Shown*

Secured Creditors	Address	City	Province /		Country	Amount Outstanding
			State	Postal Code		
Maynbridge Capital	Suite 388 - 1111 West Hastings Street	Vancouver	BC	V6E 2J3	Canada	35,920,510
Total secured creditors						\$ 35,920,510

Unsecured Creditors	Address	City	Province /		Country	Amount Outstanding
			State	Postal Code		
1677402 Alberta Ltd	o/a Freelance Signs PO Box 1161	Fox Creek	AB	T0H 1P0	Canada	609
A & B Concrete Pumping 2007 Ltd.	9939 - 276 Street	Acheson	AB	T7X 6H8	Canada	5,034
A & B Rail Service Ltd	200, 50 Strathmoor Drive	Sherwood Park	AB	T8H 2B6	Canada	412
A J G Trucking Ltd	16132-76 Street NW	Edmonton	AB	T5Z 3R8	Canada	1,347
AAA Striping & Sealcoating	P.O. Box 8156	Edmonton	AB	T6E 2A0	Canada	6,470
AccuTech Ground Disturbance Ltd.	Box 6263	Innisfail	AB	T4G1S9	Canada	735
Air Extreme Inc	6158 50 Street	Edmonton	AB	T6B 2N7	Canada	2,013
Alberta Safety Control	Box 1107	Fox Creek	AB	T0H 1P0	Canada	578
Alberta Traffic Supply Ltd.	9015 14 Street	Edmonton	AB	T6P 0C9	Canada	4,044
Alberta Treasury Branches	10020 100 St NW #2100	Edmonton	AB	T5J 0N3	Canada	1,029,875
Almita Piling Inc.	200 1603 91 Street SW	Edmonton	AB	T6X 0W8	Canada	16,930
Amazon Springs	#103, 23 Bellerose Drive	St. Albert	AB	T8N 5E1	Canada	269
Answer Asphlat and General Contracting Ltd	14630 119 Ave NW	Edmonton	AB	T5L 2P2	Canada	29,564
Arpi's North Inc.	14445 123 Ave NW	Edmonton	AB	T5L 2Y1	Canada	37,229
Atco Structures & Logistics Ltd.	300,4838 Richard RD SW	Calgary	AB	T3E 6L1	Canada	0
BRASCO SAFETY INC.	157 Athabasca Avenue	Sherwood Park	AB	T8A 4C8	Canada	678
Badger Daylighting Inc.	6740-65th Avenue	Red Deer	AB	T4P 1A5	Canada	2,181
Barcol Door Ltd.	14820 Yellowhead Trail	Edmonton	AB	T5L 3C5	Canada	680
BeDevil Oilfield Ltd	PO Box 328	Killam	AB	T0B 2L0	Canada	4,111
Bear Creek Rentals	Box 1307	Fox Creek	AB	T0H 1P0	Canada	777
Bear Creek Rentals Inc.	BOX 1307	Fox Creek	AB	T0H 1P0	Canada	1,355
Beaver Regional Waste MSC	Box 322	Ryley	AB	T0B 4A0	Canada	12,671
Boxx Modular /Black Diamond LP	Millennium Tower Suite 1000, 440 - 2nd Ave SW	Calgary	AB	T2P 5E9	Canada	45,685
Burnco Rock Products Ltd.	Postal Station "T", Box 1480	Calgary	AB	T2H 0N0	Canada	56,632
C & I Pipeline Equipment	Box 3550	Spruce Grove	AB	T7X 3A7	Canada	893
CRC-Evans Canada Ltd.	c/o C09658C P.O. Box 9658, STN. M.	Calgary	AB	T2P 0E9	Canada	780
Canadian Hydrovac Ltd.	Box 3477	Sherwood Park	AB	T8H 2T3	Canada	9,814
CannAmm Occupational Testing Services	101 McIntyre Street West Floor 2	North Bay	ON	P1B 2Y5	Canada	9,288
Cat Rental Store	16901 - 109 Avenue	Edmonton	AB	T5P 4P6	Canada	8,960
Cat The Rental Store	Fort McMurray Branch 16901 - 109 Avenue	Edmonton	AB	T5P 4P6	Canada	467
Centerline Geomatics Ltd.	P.O. Box 6079	Fort McMurray	AB	T9H 0T0	Canada	27,594
Chemco Electrical Cont. Ltd.	9220-39 Avenue	Edmonton	AB	T6E 5T9	Canada	317,745
City of Edmonton	Corporate Billing & A/R P.O. Box 2600	Edmonton	AB	T5J 5A1	Canada	1,213
Clean Harbors Canada Inc	9808 12 Ave SW	Edmonton	AB	T6X 0J5	Canada	97
Corix Water Products Limited	Attn: Customer Financial Servi 19900 84th Avenue	Langley	BC	V2Y 3C2	Canada	758
Culligan Water	265 Industrial Road	Cambridge	ON	N3H 4R7	Canada	697
D & E Woodworks Ltd	4 - 340 MacAlpine Cresnet	Fort McMurray	AB	T9H 4A8	Canada	1,528

DFI Corporation	2404 - 51 Avenue	Edmonton	AB	T6P 0E4	Canada	25,515
Delta North Geomatics Ltd	2200, 1055 - 102 Street	Edmonton	AB	T5J 4G8	Canada	242,152
Denton Canada LLP	2900 Manulife Place 10180 - 101 Street	Edmonton	AB	T5J 3V5	Canada	4,730
Derrick Concrete Cutting	& Construction Ltd. 5815-99 Street	Edmonton	AB	T6E 3N8	Canada	35,133
Derrick Disposal	3403 - 74 Avenue NW	Edmonton	AB	T6B 3B8	Canada	144,707
Doka Canada Ltd.	5404-36st. South East	Calgary	AB	T2C 1P1	Canada	26,579
ED-LAM Industrial Contracting	11209- 84 Avenue	Fort Saskatchewan	AB	T8L 4L1	Canada	86,784
Edmonton Fasteners & Tools Ltd	16409 - 111 Avenue	Edmonton	AB	T5M 2S2	Canada	1,095
Edmonton Nut & Bolt	8635 63 Avenue	Edmonton	AB	T6E 0E8	Canada	151
Eecol Electric Inc.	185 MacKay Crescent	Fort McMurray	AB	T9H 5E8	Canada	1,192
Executive Mat Service Ltd	#6, 115 - 28th Street S.E.	Calgary	AB	T2A 5K4	Canada	1,384
F5 Services	Div of 1034269 Alberta Ltd. P.O. Box 189	Irma	AB	T0E 0A0	Canada	20,081
Fox Creek Fencing	Box 923	Fox Creek	AB	T0H 1P0	Canada	1,825
Frontier Construction Products Ltd	PO Box 888 4005 50 Ave	Thorsby	AB	T0E 0T0	Canada	0
Frontier Fence and Guard Rail Ltd.	12041 32 Street NE	Edmonton	AB	T6S 1G8	Canada	21,689
GCS Energy Services	Box 220 4411 49 Street	Hardisty	AB	T4G 1P3	Canada	131,426
GFL Environmental	4208 84 Ave NW	Edmonton	AB	T6B 3N5	Canada	819
GMS Aggregates Inc.	#310, 400 Palisades Way	Sherwood Park	AB	T8H 0H4	Canada	39,696
Go Services Inc	Box 839	Bentlay	AB	T0C 0J0	Canada	1,158
Gregg Distributors (Fort McMurray) Ltd.	16215 118 Avenue	Edmonton	AB	T5V 1C7	Canada	1,067
Gregg Distributors Co. Ltd.	16215 118 Avenue	Edmonton	AB	T5V 1C7	Canada	8,470
Hardisty Home Hardware	PO BOX 220	Hardisty	AB	T0B 1V0	Canada	103
Hardisty Laundry Services	1878743 Alberta Ltd. PO Box 613	Hardisty	AB	T0B 1V0	Canada	50
Harris Steel Services Limited	318 Arvin Ave	Stoney Creek	ON	L8E 2M2	Canada	15,052
Hazmasters Inc.	651 Harwood Avenue N.	Ajax	ON	L1Z 0K4	Canada	17,621
Hertz Equipment Rental	c/o T9699 PO Box 9699, STN A	Toronto	ON	M5W 1P8	Canada	21,448
HighLine Electrical Constructors Ltd.	200, 2304-119 Avenue NE	Edmonton	AB	T6S 1B3	Canada	187,855
Hydrodig Canada Inc.	Box 215	Bentle	AB	T0C 0J0	Canada	46,350
Inland Concrete Limited a div of	Lehigh Hanson Materials Lockbox 410250 PO Box 2200	Vancouver	BC	V6B 1Y0	Canada	3,802
Integral Energy Services Ltd.	#101, 2890 Kingsview Blvd.	Airdrie	AB	T4A 0E1	Canada	1,285
Interlab	PO Box 2831	Stony Plain	AB	T7Z 1Y3	Canada	11,342
Jackson & James Industrial Services Ltd	3544 - 78 Avenue	Edmonton	AB	T6B 2X9	Canada	1,494
Jackson Rentals Ltd.	P.O. Box 78068	Edmonton	AB	T5T 6A1	Canada	245,931
Keller Foundations Ltd	2-53016 HWY 60	Acheson	AB	T7X 5A4	Canada	47,724
Kinsella Transit Mix Limited	P.O. Box 44	Kinsella	AB	T0B 2N0	Canada	41,792
Kirian Excavating and Transport Inc	PO Box 92514	Sherwood Park	AB	T8C 1G8	Canada	10,919
Konica Minolta Bus. Solutions	P.O. Box 4563, Stn. A	Toronto	ON	L4K 3N7	Canada	2,102
Lafarge Canada Inc.	C/O C25027 PO Box 2532, Station M	Calgary	AB	T2C 2P6	Canada	208,205
Layfield Canada Ltd	17720 129th Ave NW	Edmonton	AB	T5V 0C4	Canada	37,484
Little Guy Oilfield Rentals	6801 39 Street	Leduc	AB	T9E 0Z4	Canada	11,886
Local Rentals & Septic Service	4804 49 Street	Hardist	AB	T4T 1C2	Canada	2,100
LodgistX	16903 - 129 Ave NW	Edmonton	AB	T5V 1L2	Canada	215
Lynx Brand Fence (Alta) Ltd	Box 3267 255 Diamond Ave	Spruce Grove	AB	T7X 3X2	Canada	14,168
METALCARE INSPECTION SERVICES INC.	P.O Box 6549	Fort McMurray	AB	T9H 4C4	Canada	29,455
Marnevic Construction Ltd	PO Box 113	Fox Creek	AB	T0H 1P0	Canada	107,705
Master Cleaners	9705 90 St Ft	Saskatchewan	AB	T8L 1K5	Canada	95
Maverick Inspection Ltd.	22, 161 Broadway Boulevard	Sherwood Park	AB	T8H 2A8	Canada	16,414
Milepost Oilfield Services Ltd	43-26004 Township Road 544	Sturgeon County	AB	T8L 3Z3	Canada	161,347
Mutual Propane Ltd.	16203-114 Avenue	Edmonton	AB	T5M 2Z3	Canada	776

N-Star Industries	#37, 52550 Range Road 222	Ardrossan	AB	T8E 2G1	Canada	91,823
NCA Northland Construction Supplies Ltd	12404 184 St NW	Edmonton	AB	T5V 1T4	Canada	836
National Concrete Accessories	14760 116 Avenue	Edmonton	AB	T5M 3G1	Canada	1,510
Nilex Inc.	Civil Environment Group 6810 8 Street NW	Edmonton	AB	T6P 0C5	Canada	1,298
Northgate Industries Ltd	12345 121 Street	Edmonton	AB	T5L 4Y7	Canada	10,624
Northland Construction Supplies	#7, 4812 -78TH STREET	Red Deer	AB	T4P 2B3	Canada	0
Northstar Hydrovac Inc.	9407 - 158 Avenue	Grande Prairie	AB	T8X 0B9	Canada	8,237
Norwood Waterworks	10930 184 Street NW	Edmonton	AB	T5S 2P8	Canada	430
O'Hanlon Paving Ltd	16511 116th Ave NW	Edmonton	AB	T5M 3V1	Canada	20,433
OCS Group Inc	PO Box 3037	Spruce Grove	AB	T7X 3A4	Canada	450,522
PAGE THE CLEANERS	15342 - 111 Avenue	Edmonton	AB	T5M 4C8	Canada	1,167
PIERCE-CO MANUFACTURERS LTD.	12871 - 170 ST, NW	Edmonton	AB	T5V 1L8	Canada	3,189
PNR RailWorks Inc.	455 Silvercreek Parkway North	Guelph	ON	N1H 8M7	Canada	82,969
Planet Coffee Company (Edmonton)	9408 39 Ave NW	Edmonton	AB	T6E 5T9	Canada	989
ProFoxx Rentals	Box 326 205 1st Street E	Fox Creek	AB	T0H 1P0	Canada	549
Procon Systems Inc.	6025- 99 Street	Edmonton	AB	T6E 3P1	Canada	4,759
Range Geomatics Ltd	5411 106 Ave NW	Edmonton	AB	T6A 1G1	Canada	6,181
Rebel Heart Trucking-a div.	of Rebel Heart Water Hauling 2003-121 Ave N.E	Edmonton	AB	T6S 1B2	Canada	100,810
Receiver General for Canada	Place du Portage Phase III, 11A2-11 Laurier Street	Gatineau	QC	K1A 0S5	Canada	83,513
Recon Utility Search LP	PO Box 88	Hardisty	AB	T0B 1V0	Canada	19,289
Residential Remedies	10019 Fraser Ave	Fort McMurray	AB	T9H 2C8	Canada	761
Rice Engineering & Operating	9333 - 41 Avenue	Edmonton	AB	T6E 6R5	Canada	19,893
Robertson's Plumbing & Gasfitting Ltd	8718 112 Street	Fort Saskatchewan	AB	T8L 2S8	Canada	8,868
Ron's Vacuum Service Ltd	Box 2930	Wainwright	AB	T9W 1S8	Canada	4,399
Rona	CP 1011	BOUCHERVILLE	QC	J4B 8H7	Canada	504
Rona Revy Inc.	5150 SPECTRUM WAY SUITE 201	MISSISSAUGA	ON	L4W 5A1	Canada	9,960
SCS Safety Coordination Services	2nd Fl, Meridian Place 7633-50 Street	Edmonton	AB	T6B 2W9	Canada	2,620
Safety First Muirhead's Ltd	Box 261 4601 49 Street	Hardist	AB	T9C 1Z2	Canada	3,108
Sherwood Steel Ltd.	3303 84 Avenue	Edmonton	AB	T6P 1K1	Canada	2,573
Staples Advantage	c/o C25043C PO Box 2524 Station M	Calgary	AB	T2P 1B1	Canada	312
Sunbelt Rentals	PO Box 99257 Station Terminal	Vancouver	BC	V6B 0N5	Canada	51,902
Super Slings Inc.	505-11 Avenue	Nisku	AB	T9E 7N5	Canada	188
Superior Lumber Ltd.	7040 71 Street	Edmonton	AB	T6B 2M4	Canada	16,081
Superior Propane Inc.	Box #4568, STN A	Toronto	ON	M5W 0J5	Canada	15,346
Tervita Corporation	C/O C3025 P.O. BOX 2572 Stn M	Calgary	AB	T2G 0R1	Canada	115,619
Tetra Tech EBA Inc.	14940 123 Ave	Edmonton	AB	T5V 1B4	Canada	19,676
The Econo-Rack Group (2015) Inc.	Unit 3 1303 North Service Road East	Oakville	ON	L6H 1A7	Canada	2,087
Thurber Engineering Ltd.	4127 ROPER ROAD	Edmonton	AB	T6B 3S5	Canada	154,523
Titan Environmental Containment	777 Quest Blvd	Ile Des Chenes	MB	R0A 0T1	Canada	24,590
Trademark Pumping Ltd	PO Box 1167	Tofield	AB	T0B 4J0	Canada	7,051
Trades Labour Corporation	10582 109 St NW	Edmonton	AB	T5H 3B2	Canada	2,136
Tridon Communications	6172 50TH STREET	Edmonton	AB	T6B 2N7	Canada	1,420
Tuc's Contracting Ltd	283 MacApline Crescent	Fort McMurray	AB	T9H 4A5	Canada	3,244
Unicon Concrete Specialities	11740- 156 STREET	Edmonton	AB	T5M 3T5	Canada	471
United Rentals Inc	C/O V7406 PO Box 7406 Stn Terminal	Vancouver	BC	V6A 3N3	Canada	135,962
Vingrity NDT & Technical Inc.	#202, 9612 - 51 Avenue NW	Edmonton	AB	T6E 5A6	Canada	1,415
Voice Construction OPCO ULC	7545 - 52 Street	Edmonton	AB	T6B 2G2	Canada	20,759
WPS Sherwood Park Ltd.	#201, 2327 ELLSWOOD DR. SW	EDMONTON	AB	T6X 0J6	Canada	2,032
Westcon Precast Inc.	19 Riel Drive	St. Albert	AB	T8N 3Z2	Canada	0

WesternOne Rentals & Sales LP.	118 STRATHMOOR DR.	Sherwood Park	AB	T8H 2B7	Canada	0
Workopolis	Suite 402 1 Yonge Street	Toronto	ON	M5E 1E5	Canada	0
Michael Chessie						
Dale Robinson						
Louis Jacobs						
Graham Hutt						
Danny J Hawkins Sr						
Kristen Harris						
Chris Hamel						
Mark Hall						
Wayne Haffner						
Murray Glenn						
Lorraine Sharon Gibbons						
Bonnie Geldart						
Dustin John Fraser						
Ben Fox						
Harold Fowler						
Dane Fenske						
Albert Neal Everleigh						
Sophie Goupil						
Jake Geldart						
Raymond Dyson						
Eric Dumais						
Brian Dracass						
Steven Donally						
Chad D Dennis						
Duane Dahlgren						
Ryan Cockerill						
Jordan Clemens						
Ashley Cayuga						
Nathan Blacquiere						
Robin Bigcharles						
Paul Bennett						
Douglas Becker						
Marie Helene Barriault						
Cody Baker						
William Badgley						
Garry Arsenault						
Kerry Armstrong						
Dale Armstrong						
Craig W Anderson						
Cameron Ades						
Henry Carr						
Chad Burke						
Brian Bowie						
Joshua Whyte						
Michael White						
Melanie Whalen						
Jesse Welch						

Cory Watt  
Joey Waskahat  
Derek Wardle  
Wendy Wardell  
Leslie Walters  
Suleiman Waberi  
Brandon Velsink  
Michael Ullman  
Kevin Tomusiak  
Hayden Thrasher  
Cheryl Tanninen  
Gary Stephens  
Tristan Spreen  
Steven Smith  
Dana Shmyr  
Joshua Shettell  
Michael Savage  
Kimberly Sather  
Mitch Sakundiak  
Billie Ruzycki  
Brandon Rosychuk  
Manuel Rosales  
James Rodrigo  
Curtis Reid  
Chitanand Razz Razwantee  
Veronica Polturak  
Darlene Phillips  
Brandon Pederson  
Daniel Jame Parsons  
Teddy Paquette  
Jami Osterland  
Henry Nguyen  
Dong My Nguyen  
Dillon Newby  
Ablaya Ndiaye  
Hilda Mustard  
Christian Kevi Mortega  
Jayden Morasse  
Gregory Moores  
Shawn Moncrieff  
Conlynn J. Melenka  
Shane Mclean  
George Mclean  
Andrew LK McKenna  
Trevor McKay  
Travis Wayn McKay  
Jordan J McKay  
Kristopher G. Maurer  
Patrick Nick Matalski

Ryan B Manansala  
 Matthew Maia  
 Ian Macdougall  
 Keith Lisowski  
 Mathieu Lagace  
 Vivian Kropp  
 Autumn Rach Kowalenko  
 Robert (Bob) Keddy  
 Gennadiy Kartavenko  
 Lamine Kaba  
 Dylan Jones  
 Alvin Jamieson  
 Shaun Trithardt  
 Mike Stenvold  
 Cody Pyzik  
 Shaun Boutilier  
 Blaine Ofukany  
 Robert McKenna  
 Latchman Bhagwandas  
 Michael Scott Almon  
 Marco Simpatio  
 Voice Construction OPCO ULC  
 Voice Management Ltd.

7545 52 St NW  
 7545 52 St NW

Edmonton  
 Edmonton

AB  
 AB

T6B 2G2  
 T6B 2G2

Canada  
 Canada

5,852,926  
 66,069,250

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Total unsecured creditors \$ 77,118,890