COURT FILE NUMBER Q.B. No. 733 of 2021

COURT OF QUEEN'S BENCH FOR SASKATCHEWAN IN BANKRUPTCY AND INSOLVENCY

APPLICANT

ABBEY RESOURCES CORP.

JUDICIAL CENTRE

SASKATOON

IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT, RSC 1985, c C-36, AS AMENDED

AND

IN THE MATTER OF A PROPOSED PLAN OF ARRANGEMENT FOR THE CREDITORS OF ABBEY RESOURCES CORP.

NOTICE OF APPLICATION (Sealing of the Confidential Supplement)

NOTICE TO RESPONDENTS

This application is made against you. You are a respondent. You have the right to state your side of this matter before the Court.

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

Where

Court of Queen's Bench for Saskatchewan

520 Spadina Crescent East Saskatoon, SK S7K 3G7

Date

Monday, February 28, 2022

Time

10:00 a.m.

Due to the health risks posed by the COVID-19 pandemic, all chambers applications will be heard by telephone unless the presiding judge has decided otherwise. To confirm the telephone number where you can be reached on the date of the application, you must immediately contact the office of the local registrar at (306) 933 5135 and provide your telephone number. You must remain available by telephone at that number on that date until your matter is heard. (Read the Notice at 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, MNP Ltd. (the "Monitor"), in its capacity as the court-appointed monitor of Abbey Resources Corp. (the "Company"), seeks an order:
 - (a) abridging the time for service of this Notice of Application and deeming the Notice of Application and all other materials filed in support of the same on the parties listed in the Service List established in these proceedings to be good, valid, timely, and sufficient; and
 - (b) sealing the Confidential Supplement to the Fifth Report of the Monitor (the "Confidential Supplement") until further Order of the Court; and
 - (c) granting such further and other relief as counsel may request and this Honourable Court may allow.

Grounds for making this application:

- 2. The Confidential Supplement contains Sproule Asset Management Ltd.'s cost estimates for the reclamation, abandonment, and pipeline remediation work in respect of the Company's pipeline.
- 3. These estimates constitute commercially sensitive information that could affect the integrity of a future sales process for the Company's assets.

Material or evidence to be relied on:

- 4. The Monitor relies on:
 - (a) this Notice of Application;
 - (b) the Service List;
 - (c) the Fifth Report of the Monitor;
 - (d) the Confidential Supplement (unfiled);

- (e) a proposed form of draft Order;
- (f) proof of service (to be filed);
- (g) proof of compliance with General Application Practice Directive #3;
- (h) the pleadings and proceedings herein; and
- (i) such further and other material as this Honourable Court may allow.

Applicable Rules:

5. N/A

Applicable Acts and Regulations:

6. N/A

NOTICE

If you wish to oppose the application, you or your lawyer must prepare an affidavit in response, serve a copy at the address for service given at the end of this document, and file it in the court office, with proof of service, at least 7 days before the date set for hearing the application. You or your lawyer must also come to court for the hearing of the application on the date set.

AND FURTHER TAKE NOTICE that if you do not appear at the hearing an order may be made in your absence and enforced against you. YOU WILL NOT RECEIVE FURTHER NOTICE OF THIS APPLICATION.

Dated at the City of Saskatoon, in the Province of Saskatchewan this 25th day of February, 2022.

McDOUGALL GAULEY LLP

Per:

Solicitors for the applicant, MNP Ltd., in its capacity as the court appointed Monitor of Abbey Resources Corp.

CONTACT INFORMATION AND ADDRESS FOR SERVICE

Name of firm:

Name of lawyer in charge of file:

Address of legal firm:

Telephone / Facsimile:

Email address:

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