



**Bennett Jones**

**Bennett Jones LLP**

4500 Bankers Hall East, 855 2nd Street SW

Calgary, Alberta, T2P 4K7 Canada

T: 403.298.3100

F: 403.265.7219

**Ken Lenz, Q.C.**

Direct Line: 403.298.3317

e-mail: lenzk@bennettjones.com

Our File No.: 87591.2

January 22, 2020

**Via Email/Courier**

The Parties on the Attached Service List

Dear Sir/Madam:

**Re: GMT Capital Corp. v. Strategic Oil and Gas Ltd., et al.**

Please find enclosed filed copies of the following documents which will be referred to at the hearing scheduled on January 28, 2020 at 2:00 p.m.:

1. Statement of Claim;
2. Application (Appointment of a Receiver and Manager) with draft Order attached as Schedule "A" thereto;
3. Affidavit of Harold Randall sworn January 22, 2020; and
4. Blackline template receivership order.

Thank you for your interest in this matter.

Yours truly,



Ken Lenz  
KL/dmk  
Enclosures

**GMT CAPITAL CORP. v. STRATEGIC OIL AND GAS LTD, ET AL.**

Service List  
(January 22, 2020)

Service Recipient	Recipient Status	Service Method
<p><b>Dentons Canada LLP</b> 850 – 2nd Street SW Calgary, Alberta T2P 0R8</p> <p><b>Attention: David W. Mann &amp; Afshan Naveed</b> Email: <a href="mailto:david.mann@dentons.com">david.mann@dentons.com</a> <a href="mailto:afshan.naveed@dentons.com">afshan.naveed@dentons.com</a></p>	Counsel for the Defendants	Email
<p><b>KPMG Inc.</b> Bow Valley Square II Suite 3100 205 – 5 Avenue SW Calgary, Alberta T2 P 4B9</p> <p><b>Attention: Neil Honess &amp; Cameron Browning</b> Email: <a href="mailto:neilhoness@kpmg.ca">neilhoness@kpmg.ca</a> <a href="mailto:cbrowning@kpmg.ca">cbrowning@kpmg.ca</a></p>	Court-appointed Receiver	Email
<p><b>Torys LLP</b> 525 – 8<sup>th</sup> Avenue SW Calgary, Alberta T2P 1G1</p> <p><b>Attention: Kyle Kashuba</b> Email: <a href="mailto:kkashuba@torys.com">kkashuba@torys.com</a></p>	Counsel for the Receiver	Email
<p><b>Bennet Jones LLP</b> 4500 Bankers Hall East 855 2<sup>nd</sup> Street SW Calgary, Alberta T2P 4K7</p> <p><b>Attention: Ken T. Lenz, Alexis Teasdale &amp; Colin Perry</b> Email: <a href="mailto:lenzk@bennettjones.com">lenzk@bennettjones.com</a> <a href="mailto:teasdaleA@bennettjones.com">teasdaleA@bennettjones.com</a> <a href="mailto:perryc@bennettjones.com">perryc@bennettjones.com</a></p>	Counsel for the Plaintiff, GMT Capital Corp.,	Email
<p><b>Royal Bank of Canada</b> Corporate Banking 3900 Bankers Hall West 888-3<sup>rd</sup> Street SW Calgary, Alberta T2P 5C5</p> <p><b>Attention: Ryan Stasynech &amp; Mari Hodgkinson</b> Email: <a href="mailto:ryan.stasynech@rbc.com">ryan.stasynech@rbc.com</a> <a href="mailto:mari.hodgkinson@rbc.com">mari.hodgkinson@rbc.com</a></p>	Secured Creditor	Email

Service Recipient	Recipient Status	Service Method
<p><b>Libra Advisors</b>   <b>Attention: Vipul Pandey</b>                      Email: <a href="mailto:vp@libraadvisors.com">vp@libraadvisors.com</a></p>	<p>Equity Holder</p>	<p>Email</p>
<p><b>PrairieSky Royalty Ltd.</b>                      1700, 350 – 7<sup>th</sup> Ave SW                      Calgary, AB T2P 3N9   <b>Attention: Dale Percy</b>                      Email: <a href="mailto:Dale.Percy@prairiesky.com">Dale.Percy@prairiesky.com</a></p>	<p>Creditor</p>	<p>Email</p>
<p><b>Carscallen LLP</b>                      900, 332-6<sup>th</sup> Ave SW                      Calgary, AB T2P 0B2   <b>Attention: Glenn Blackett</b>                      Email: <a href="mailto:blackett@carscallen.com">blackett@carscallen.com</a></p>	<p>Counsel for Ensign Drilling Inc. (operating as Ensign Testing Services), Builders' Lien &amp; Counsel for Apex Distribution Inc., Builders' Lien</p>	<p>Email</p>
<p><b>Reynolds Mirth Richards &amp; Farmer LLP</b>                      3200, 10108 -101 Street                      Edmonton, AB T5J 3W8   <b>Attention: Mikkel J. Arnston</b>                      Email: <a href="mailto:marnston@rmrf.com">marnston@rmrf.com</a></p>	<p>Counsel for Global Well Servicing Ltd., Builders' Lien</p>	<p>Email</p>
<p><b>Alberta Energy Regulator</b>                      Suite 1000, 250 – 5<sup>th</sup> Street SW                      Calgary, AB T2P 0R4   <b>Attention: Maria Lavelle</b>                      Email: <a href="mailto:Maria.Lavelle@aer.ca">Maria.Lavelle@aer.ca</a>  <a href="mailto:insolvency@aer.ca">insolvency@aer.ca</a>  <b>Attention: Candice Ross</b>                      Email: <a href="mailto:Candice.Ross@aer.ca">Candice.Ross@aer.ca</a></p>		<p>Email</p>
<p><b>Government of Alberta</b>  <b>Department of Energy</b>                      9<sup>th</sup> Floor, 9945 – 108<sup>th</sup> Street                      Edmonton, AB T5K 2G6   <b>Attention: Keri Ridley and Kenneth Whitelaw</b>                      Email: <a href="mailto:Keri.Ridley@gov.ab.ca">Keri.Ridley@gov.ab.ca</a>  <a href="mailto:Kenneth.Whitelaw@gov.ab.ca">Kenneth.Whitelaw@gov.ab.ca</a></p>		<p>Email</p>

Service Recipient	Recipient Status	Service Method
<p><b>Cassels Brock</b>                  2200 HSBC Building                  885 West Georgia Street                  Vancouver, BC V6C 3E8</p> <p><b>Attention: Mary Buttery, Jeffrey Oliver and Lance Williams</b>                  Email: <a href="mailto:mbuttery@casselsbrock.com">mbuttery@casselsbrock.com</a>  <a href="mailto:joliver@casselsbrock.com">joliver@casselsbrock.com</a>  <a href="mailto:lwilliams@casselsbrock.com">lwilliams@casselsbrock.com</a></p> <p>With copy to: <b>Simone Tielesh and Ian Blackstock</b>                  Email: <a href="mailto:Simone_Tielesh@gov.nt.ca">Simone_Tielesh@gov.nt.ca</a>  <a href="mailto:Ian_Blackstock@gov.nt.ca">Ian_Blackstock@gov.nt.ca</a></p>	<p>Legal counsel to Government of North West Territories</p>	<p>Email</p>
<p><b>883492 Alberta Ltd. o/a Pinnacle Services</b>                  Box 478                  High, Level, AB T0H 1Z0</p> <p>Email: <a href="mailto:admin@pinnacleserviceshighlevel.ca">admin@pinnacleserviceshighlevel.ca</a></p>	<p>Unsecured Creditor</p>	<p>Email</p>
<p><b>Miles Davison LLP</b>                  Barristers &amp; Solicitors                  #900, 517 – 10<sup>th</sup> Avenue SW                  Calgary, Alberta T2R 0A8  <b>Attention: Calvin C. Robb</b>                  Email: <a href="mailto:crobb@milesdavison.com">crobb@milesdavison.com</a></p>	<p>Counsel for Tryton Tool Services, Formula Powell LP, Strike Energy Services Ltd., Strike Group Limited Partnership, Builders' Lien,</p>	<p>Email</p>
<p><b>Kenneth P. Reh Law Office</b>                  Suite 702, One Executive Place                  1816 Crowchild Trail NW                  Calgary, AB T2M 0M5</p> <p><b>Attention: Kenneth Reh</b>                  Email: <a href="mailto:ken@reh-law.ca">ken@reh-law.ca</a></p>	<p>Counsel for Baker Hughes Canada Company, Creditor</p>	<p>Email</p>
<p><b>Miles Davison LLP</b>                  Suite 900                  517 - 10th Ave SW                  Calgary AB T2R 0A8                  Attention: Terry Czechowskyj                  Email: <a href="mailto:tczech@milesdavison.com">tczech@milesdavison.com</a></p>	<p>Counsel for Canadian Energy Regulator</p>	<p>Email</p>

**COURIER SERVICE**

<b>Roynat Inc.</b> Suite 1500, 4710 Kingsway St. Burnaby, BC V5H 4M2	Secured Creditor	Courier
<b>True North Ford Ltd.</b> 10102 97 Street High Level, AB T0H 1Z0	Secured Creditor	Courier
<b>Meridian Onecap Credit Corp.</b> Suite 1500, 4710 Kingsway Burnaby, BC V5H 4M2	Secured Creditor	Courier
<b>National Energy Board</b> Secretary of the Board Suite 210, 517 – 10 <sup>th</sup> Ave SW Calgary, AB T2R 0A8		Courier