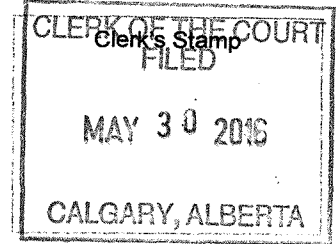


COURT FILE NUMBER 1601 06765  
COURT COURT OF QUEEN'S BENCH OF ALBERTA  
JUDICIAL CENTRE CALGARY  
APPLICANT(S) IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT, RSC 1985, c. C-36, AS AMENDED



AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF ENDURANCE ENERGY LTD.

DOCUMENT **ORIGINATING APPLICATION**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF **Thornton Grout Finnigan LLP**  
100 Wellington Street West, Suite 3200  
Toronto, Ontario M5K 1K7  
CANADA

PARTY FILING THIS DOCUMENT  
Phone: (416) 304-1616  
Fax: (416) 304-1313

**Attention: Robert I. Thornton / Leanne Williams / Rachel Bengino**  
File No: 1751-001

**NOTICE TO THE 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 Court.

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

Date: May 30, 2016  
Time: 2:15 pm  
Where: Calgary Courts Center

Before: The Honourable Justice Horner

Go to the end of this document to see what you can do and when you must do it.

**Basis for this claim:**

1. Endurance Energy Ltd. (the “**Applicant**”) is a company to which the *Companies’ Creditors Arrangement Act*, RSC 1985, c. C-36, as amended (the “**CCAA**”) applies.
2. The Applicant cannot meet its liabilities as they generally become due and is insolvent.
3. The total amount of the claims against the Applicant exceeds \$5 million.
4. The Applicant requires a stay of proceedings in order to preserve the status quo to allow the Company to effect a reorganization for the general benefit of its stakeholders.
5. Such other grounds as are set forth in the Affidavit of Steven VanSickle sworn May 30, 2016 (the “**VanSickle Affidavit**”).
6. The provisions of the CCAA and the equitable jurisdiction of this Honourable Court.
7. Such further and other grounds as counsel may advise and this Honourable Court may permit.

**Remedy sought:**

8. An Initial Order:
  - (a) abridging the time for service of this Application, deeming its service to have been good and sufficient and dispensing on service of this Application on any other parties;

- (b) granting an interim stay order pursuant to Section 11 of the CCAA;
- (c) authorizing the Company to carry on business in a manner consistent with the preservation of its property and business;
- (d) appointing FTI Consulting Canada Inc. as Monitor of the Company in these proceedings;
- (e) authorizing the Company to pay the reasonable fees and disbursements of its professional advisers and counsel to the Interim Lender (as defined in the Application) and granting an Administration Charge in favour of those professional advisors;
- (f) granting a Directors' and Officers' Charge in the amount of \$1million;
- (g) approving interim financing for the Applicant in the principal amount of USD\$15 million and granting an Interim Financing Charge in the amount of USD\$20 million;
- (h) sealing the engagement letter entered into by Applicant and its financial advisor;  
and
- (i) Granting such further and other relief as this Honourable Court may deem just.

9. A Sales Process Order:

- (a) approving the sales process as set out in the within Application Record;

**Affidavit or other evidence to be used in support of this application:**

10. The VanSickle Affidavit, the consent of FTI Consulting Canada Inc. (the “**Monitor**”) to act as Monitor of the Applicant, the pre-filing Monitor’s Report, and such further and other material as counsel may advise and this Honourable Court may permit.

**Applicable Acts and regulations:**

11. The CCAA, the *Judicature Act* and such further and other acts and regulations as counsel may advise and this Honourable Court may permit.
12. In person, before the Honourable Justice Horner at the Calgary Courts Center, 601 – 5<sup>th</sup> Street SW, Calgary, Alberta, on May 30, 2016 at 2:15 pm, or so soon thereafter as counsel may be heard.

**WARNING**

You are named as a respondent because you have made or are expected to make an adverse claim in respect of this originating application. If you do not come to Court either in person or by your lawyer, the Court may make an order declaring you and all persons claiming under you to be barred from taking any further proceedings against the applicant(s) and against all persons claiming under the applicant(s). You will be bound by any order the Court makes, or another order might be given or other proceedings taken which the applicant(s) is/are entitled to make without any further notice to you. If you want to take part in the application, you or your lawyer must attend in Court on the date and at the time shown at the beginning of this 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.