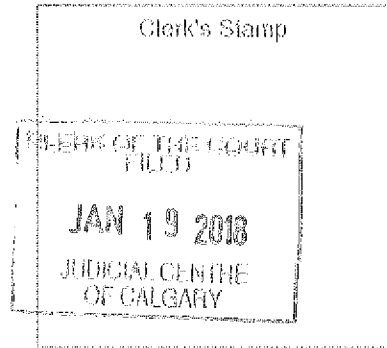


Form 27
Rule 6.3 and 10.52(1)



ESTATE NO.: 25-2332583
25-2332610
25-2335351

COURT COURT OF QUEEN'S BENCH OF
ALBERTA
IN BANKRUPTCY AND INSOLVENCY

JUDICIAL CENTRE CALGARY

APPLICANT MANITOK ENERGY INC., RAIMOUNT ENERGY CORP. and
CORINTHIAN OIL CORP.

IN THE MATTER OF THE NOTICE OF INTENTION TO
MAKE A PROPOSAL OF MANITOK ENERGY INC.

IN THE MATTER OF THE NOTICE OF INTENTION TO
MAKE A PROPOSAL OF RAIMOUNT ENERGY CORP.

IN THE MATTER OF THE NOTICE OF INTENTION TO
MAKE A PROPOSAL OF CORINTHIAN OIL CORP.

DOCUMENT

**APPLICATION FOR THE CONSOLIDATION OF
PROCEEDINGS**

ADDRESS FOR
SERVICE AND
CONTACT
INFORMATION
OF PARTY
FILING THIS
DOCUMENT

Gowling WLG (Canada) LLP
1600, 421 7th Avenue SW
Calgary, AB T2P 4K9

Telephone: (403) 298-1938

Facsimile: (403) 695-3538

File No: A155249

Attention: Tom Cumming

NOTICE TO RESPONDENTS

This application is made against you. You are Respondents.

You have the right to state your side of this matter before the Judge.

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

Date: January 23, 2018
Time: 1:00 p.m.
Where: Calgary Courts Centre
Before Whom: The Honourable Madam Justice K.M Horner

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

Remedy claimed or sought:

1. The Applicants, Manitok Energy Inc. ("**Manitok**"), Raimount Energy Corp. ("**Raimount**") and Corinthian Oil Corp. ("**Corinthian**") seek the following relief from this Honourable Court:
 - (a) an order consolidating Alberta Court of Queen's Bench in Bankruptcy and Insolvency Estate Nos. 25-2332610 (the "**Manitok Proceeding**"), 25-2332610 (the "**Raimount Proceeding**") and 25-2335351 (the "**Corinthian Proceeding**", and collectively with the Manitok Proceeding and the Raimount Proceeding, the "**Proceedings**"), whereby the Raimount and Corinthian Proceedings are consolidated into the Manitok Proceeding for the duration of the Proceedings; and
 - (b) an order clarifying that the scope of the sealing order granted in the application heard in the Manitok Proceeding and the Raimount Proceeding on Friday January 12, 2018 at 2:00 p.m. before the Honourable Madam Justice K.M. Horner (the "**Sealing Order**") applies only as set out in paragraph 2 of Sealing Order, and specifically, that it does not apply to the transcripts from the application.

Grounds for making this application:

Consolidation Order

2. Corinthian and Raimount are wholly owned subsidiaries of Manitok and their respective insolvencies arose from Manitok transactions in respect of which they guarantors.

3. Manitok is a junior oil and gas company headquartered in Calgary, Alberta. Its assets consist of, among other things, oil and gas mineral leases, surface leases, wells, production contracts, and various oil and gas equipment.
4. Raimount's and Corinthian's assets are similar to Manitok's, but have substantially lesser aggregate value. As a result, consolidation of the Proceedings will have little or no impact on the administration of each Applicant's insolvency proceeding.
5. The proposed consolidation is necessary and appropriate to enable the Court and the parties to:
 - (a) determine common questions of fact and law between the parties;
 - (b) clarify the issues and claims being advanced as they relate to the same transaction or series of transactions;
 - (c) ensure consistency and avoid the possibility of conflicting decisions; and
 - (d) facilitate the efficient and economic administration of means of resolving the Proceedings.
6. The parties to the Proceedings will suffer no prejudice that cannot be remedied through costs if leave to consolidate is granted.

Release of Transcripts

7. On January 12, 2018, Madam Justice Horner issued a Sealing Order sealing certain confidential exhibits to the affidavit of Audrey Ng, dated January 12, 2018 (the "**Sealing Order**").
8. Any and all confidential information disclosed during the application heard on January 12, 2018 was struck from the record. As a result, the Transcripts contain no confidential information.
9. The parties to the Proceedings will suffer no prejudice if the Sealing Order is lifted in respect of the Transcripts.
10. Such further and other grounds as counsel may advise and this Honourable Court may permit.

Material or evidence to be relied on:

11. The Affidavit of Massimo Geremia, sworn January 19, 2018;
12. The pleadings and evidence filed in Alberta Court of Queen's Bench in Bankruptcy and Insolvency, Estate Nos. 25-2332610, 25-2332610 and 25-2335351
13. Such other material as counsel may advise and this Honourable Court may permit.

Applicable rules:

14. Rules 1.2, 1.3, 1.4, 3.72, 6.34 and 6.9, and 9.14 of the *Alberta Rules of Court*.

Applicable Acts and regulations:

15. None of which the Applicant is aware.

Any irregularity complained of or objection relied on:

16. None of which the Applicant is aware.

How the application is proposed to be heard or considered:

17. In person.

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 time shown at the beginning of this form. If you intend to rely on an affidavit or other evidence when the application is heard or considered, you must reply by giving reasonable notice of the material to the applicant.