

**IN THE COURT OF QUEEN'S BENCH OF ALBERTA  
JUDICIAL CENTRE OF CALGARY**

**IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT*  
ACT, R.S.C. 1985, c. C-36, AS AMENDED**

**AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF  
TRIDENT EXPLORATION CORP., FORT ENERGY CORP., FENERGY CORP., 981384  
ALBERTA LTD., 981405 ALBERTA LTD., 981422 ALBERTA LTD., TRIDENT  
RESOURCES CORP., TRIDENT CBM CORP., AURORA ENERGY LLC., NEXGEN  
ENERGY CANADA, INC. AND TRIDENT USA CORP.**

**NOTICE OF MOTION**

**TAKE NOTICE** that an application will be made on behalf of the Petitioners in these proceedings (collectively, "Trident") before the Honourable Justice Romaine, in Chambers, at the Calgary Courts Center, 601 - 5<sup>th</sup> Street SW, in the City of Calgary, Province of Alberta on Thursday, the 29th day of April, 2010 at 9:00 in the forenoon or so soon thereafter as counsel may be heard, for an Order:

1. Declaring service of notice of this application and the supporting materials to be good and sufficient, and abridging the time therefor, if necessary;
2. Extending the Stay Period (as such term is defined in the Amended and Restated Initial Order) in these proceedings to May 13, 2010; and
3. Granting such further and other relief as counsel may advise and this Honourable Court deems just.

**AND FURTHER TAKE NOTICE** that the grounds for this application are as follows:

1. A short extension of the Stay Period to May 13, 2010 is necessary and appropriate in the circumstances.
2. On April 30, 2010, several important events to Trident's restructuring proceedings will occur, which events are of relevance and will need to be considered in any application of Trident for an extension of the Stay Period.

3. Trident continues to work closely with the Monitor and all of Trident's stakeholders in all respects, and the Monitor supports the proposed relief and stay extension.
4. Trident has acted and continues to act in good faith and with diligence with respect to these CCAA proceedings and, in conjunction and with the assistance of its financial and other advisors, and in coordination with the Monitor, has:
  - (a) continued ongoing negotiations with its stakeholders to further its various restructuring efforts;
  - (b) worked extensively with its stakeholders to ensure that the material conditions of the Commitment Letter are and continue to be met;
  - (c) continued to administer the SISIP in accordance with the terms and conditions thereof; and
  - (d) continued to negotiate emergence financing for Trident, including continuing discussions with those expressing interest.

**AND FURTHER TAKE NOTICE** that the Applicants will rely upon the Affidavit of Todd A. Dillabough, dated March 11, 2010, filed; the Seventh Report, Ninth Report, Tenth Report, and Eleventh Report of the Monitor; the provisions of the *Companies' Creditors Arrangement Act (Canada)* and the *Alberta Rules of Court*; and such further and other material as counsel may advise and this Honourable Court may permit.

**DATED** at the City of Calgary, in the Province of Alberta, this 26<sup>th</sup> day of April, 2010.

**FRASER MILNER CASGRAIN LLP,**  
solicitors for the Applicants

Per: 

David W. Mann / Derek M. Pontin

**TO:** The Clerk of the Court  
**AND TO:** The Attached Service List

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RESOURCES CORP., TRIDENT CBM CORP., AURORA ENERGY LLC., NEXGEN  
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**LAST UPDATED: APRIL 20, 2010**

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Action No. 0901-13483

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