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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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<i>In re:</i>	: Chapter 15
	:
OILSANDS QUEST INC.,	: Case No. 12-10476 (MG)
	:
Applicant in Foreign Proceeding.	: (Joint Administration Requested)
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<i>In re:</i>	: Chapter 15
	:
Oilsands Quest Sask Inc.,	: Case No. 12-10477 (MG)
	:
Applicant in Foreign Proceeding.	: (Joint Administration Requested)
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<i>In re:</i>	: Chapter 15
	:
Township Petroleum Corporation,	: Case No. 12-10478 (MG)
	:
Applicant in Foreign Proceeding.	: (Joint Administration Requested)
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<i>In re:</i>	: Chapter 15
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Stripper Energy Services Inc.,	: Case No. 12-10479 (MG)
	:
Applicant in Foreign Proceeding.	: (Joint Administration Requested)
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<i>In re:</i>	: Chapter 15
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1291329 Alberta Ltd.,	: Case No. 12-10480 (MG)
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Applicant in Foreign Proceeding.	: (Joint Administration Requested)
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<i>In re:</i>	: Chapter 15
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Oilsands Quest Technology Inc.,	: Case No. 12-10481 (MG)
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Applicant in Foreign Proceeding.	: (Joint Administration Requested)
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<i>In re:</i>	: Chapter 15
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1259882 Alberta Ltd.,	: Case No. 12-10482 (MG)
	:
Applicant in Foreign Proceeding.	: (Joint Administration Requested)
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<i>In re:</i>	: Chapter 15
	:
Western Petrochemicals Group	: Case No. 12-10483 (MG)
	:
Applicant in Foreign Proceeding.	: (Joint Administration Requested)
	:
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**MOTION FOR ORDER SPECIFYING FORM
AND MANNER OF SERVICE OF NOTICE**

Ernst & Young Inc. is the court-appointed monitor (the "**Monitor**") and authorized foreign representative of Oilsands Quest Inc. and certain of its direct and indirect subsidiaries, Oilsands Quest Sask Inc., Township Petroleum Corporation, Stripper Energy Services Inc., 1291329 Alberta Ltd., Oilsands Quest Technology Inc., 1259882 Alberta Ltd., and

Western Petrochemicals Group (collectively, the "**Oilsands Group**") in proceedings (the "**Canadian Proceedings**") under Canada's *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, pending before the Court of Queen's Bench of Alberta (the "**Alberta Court**").

The Monitor has commenced these chapter 15 cases (the "**Chapter 15 Cases**") ancillary to the Canadian Proceedings by filing *Verified Petitions for Recognition of Foreign Proceedings and Related Relief* (collectively, the "**Chapter 15 Petitions**") with the accompanying documentation required pursuant to sections 1504 and 1515 of title 11 of the United States Code (as amended, the "**Bankruptcy Code**").

The Monitor makes this Motion pursuant to sections 105(a), 1514, and 1515 of the Bankruptcy Code and Rules 1007, 2002, 9007, and 9008 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**") for an order in the form annexed hereto as Exhibit A (the "**Proposed Order**") (i) approving the notice of the Chapter 15 Petitions in the form annexed thereto as Exhibit 1 (the "**Notice**"), (ii) specifying the manner of service of the Notice, and (iii) scheduling a hearing on the relief sought in the Chapter 15 Petitions. In support thereof, the Monitor respectfully represents as follows:

BACKGROUND

1. The Court is respectfully referred to the Chapter 15 Petitions for a description of the Canadian Proceedings and the Oilsands Group's activities, business, corporate organization, capital structure, and circumstances leading to the filing of the Chapter 15 Cases.

RELIEF REQUESTED

2. The Monitor respectfully requests that the Notice be approved by this Court pursuant to Bankruptcy Rules 2002(m) and 9007, and that it be permitted to serve the Notice (i) by United States mail, first-class postage prepaid or by overnight courier upon all

known creditors and all other parties against whom relief is sought (or their counsel), including any such parties (or counsel) that have addresses outside the United States, in accordance with Bankruptcy Rules 1010 and 7004(a) and (b) on or before February 16, 2012, and (ii) by publication of the Notice in *The Wall Street Journal* (U.S. Edition) on or before February 16, 2012. The Monitor requests that the foregoing be approved as adequate and sufficient form and manner of notice of the Chapter 15 Petitions.

3. The Monitor respectfully requests that if any party files a notice of appearance in this case, the Monitor shall serve the Notice and subsequent notices upon such party within ten (10) days of the filing of such notice of appearance if such documents have not already been served on such party (or its counsel).

4. The Monitor respectfully requests that the Court also require that objections or responses, if any, to the Chapter 15 Petitions must be made pursuant to the Bankruptcy Code, the local rules of the Court, and the Bankruptcy Rules and in writing describing the basis therefore, which objection or response must be filed with the Court electronically in accordance with General Order M-399 by registered users of the Court's electronic case filing system, and by all other parties in interest, on a 3.5 inch disc, preferably in Portable Document Format (PDF), Word Perfect or any other Windows-based word processing format, with a hard copy to the Chambers of the Honorable Martin Glenn, United States Bankruptcy Judge, and served upon counsel for the Monitor, by no later than March 8, 2012, at 4:00 p.m. Eastern Standard Time. Notices to counsel for the Monitor should be addressed to Allen & Overy LLP, 1221 Avenue of the Americas, New York, New York 10020, Attention: Ken Coleman and Jonathan Cho.

5. The Monitor respectfully requests that a hearing to consider the Chapter 15 Petitions be scheduled for March 15, 2012, at 2:00 p.m. Eastern Standard Time, or at a time convenient for the parties and for the Court.

6. The Monitor respectfully requests that the Court waive the requirements of section 1514(c) of the Bankruptcy Code, which provides that when "a notification of commencement of a case is to be given to foreign creditors, such notification shall (1) indicate the time period for filing proofs of claim and specify the place for filing such proofs of claim; [and] (2) indicate whether secured creditors need to file proofs of claim" 11 U.S.C. § 1514(c). The claims process for the Oilsands Group will be established, and ample notice of all relevant bar dates and related requirements will be provided, in the Canadian Proceedings.

WHEREFORE, the Monitor respectfully requests (i) entry of an order in the form of the Proposed Order approving the form and manner of service of the Notice, (ii) waiver of the requirements in section 1514(c) of the Bankruptcy Code, and (iii) such other and further relief as is appropriate under the circumstances.

Dated: New York, New York
February 7, 2012

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/s/ Ken Coleman

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