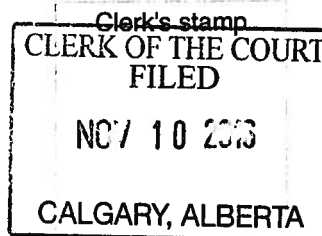


COURT FILE NUMBER 1601-14057
BANKRUPTCY 24 – 2180230
ESTATE/COURT FILE NO: 24 – 2180231
COURT COURT OF QUEEN'S BENCH OF ALBERTA
JUDICIAL CENTRE Calgary
APPLICANTS IN THE MATTER OF THE *BANKRUPTCY AND
INSOLVENCY ACT*, R.S.C. 1985, c. B-3, as
amended



AND IN THE MATTER OF THE BANKRUPTCY
OF QUINTERA DRILLING LIMITED
PARTNERSHIP and QUINTERA DRILLING
2010 INC.

DOCUMENT **APPLICATION**

ADDRESS FOR
SERVICE AND
CONTACT
INFORMATION OF
PARTY FILING THIS
DOCUMENT

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Quintera 2010 Inc.

File no.: 01032461-0001

NOTICE TO RESPONDENT

This application is made against you. You are a respondent.

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:	November 14, 2016
Time:	4:00 p.m.
Where:	Calgary Courts Centre
Before Whom:	The Honourable Madam Justice K.M. Eidsvick, on the Commercial List

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

Remedy claimed or sought:

1. An Order providing the following relief:
 - (a) Abridging the timelines for service of this application;
 - (b) Permitting the Trustee to file a report on the Proposal with the Court and the Official Superintendent in Bankruptcy and abridging the filing deadlines to allow it to do so;
 - (c) Permitting the within application to be heard in Calgary;
 - (d) Approving the proposal in bankruptcy of Quintera Drilling Limited Partnership ("Quintera LP") and Quintera Drilling 2010 Inc. ("Quintera Inc.");
 - (e) Declaring the annulment of the Bankruptcy of Quintera LP and Quintera Inc. annulled as of the date set out in the Proposal.
2. Such further and other relief as this Honourable Court deems just and appropriate.

Grounds for making this application:

3. On October 21, 2016, Quintera LP and Quintera Inc. voluntarily filed an assignment into Bankruptcy pursuant to the BIA.
4. On October 24, 2016, Ernst & Young Inc. was appointed as the Trustee in Bankruptcy over Quintera LP and Quintera Inc.
5. On October 24, 2016, the Honourable Justice B.E.C. Romaine granted an Order providing the following relief *inter alia*:

- (a) That the bankruptcy proceedings of Quintera LP and Quintera Inc. be consolidated;
- (b) That Quintera LP and Quintera Inc. be permitted to file a joint proposal in Bankruptcy with the official receiver prior to the appointment of Inspectors;
- (c) That the first meeting of creditors shall be held no later than November 14, 2016, and that the meeting of creditors to vote on the Proposal shall be held immediately following the first meeting of creditors on the same day.

6. On October 27, 2016, the Trustee sent a notice to the creditors of Quintera LP and Quintera Inc. that included, among other things:

- (a) The Statement of Affairs of Quintera LP and Quintera Inc.;
- (b) the Proposal in bankruptcy of Quintera LP and Quintera Inc.;
- (c) a notice of the first meeting of creditors, to be held on November 10, 2016 at 10:00 a.m. at the offices of the Trustee; and
- (d) a notice of the meeting of creditors to vote on the Proposal, to be held on November 10, 2016 following the first meeting of creditors.

7. At the first meeting of creditors, no inspectors were appointed although creditors had an opportunity to appoint inspectors.

8. The Proposal was approved by the requisite number of creditors in each class.

9. The Proposal is fair and reasonable to the Applicants general body of secured and unsecured creditors and will provide for recovery greatly in excess of what those creditors would receive in liquidation proceedings.

Material or evidence to be relied on:

10. The report of the Trustee, to be filed, including particulars of the creditor votes on the Proposal.

11. The previous pleadings and proceedings, filed herein.

Applicable rules:

12. *Alberta Rules of Court*, Alta. Reg. 124/2010, 1.3, 1.4, 6.3

Applicable Acts and regulations:

13. The *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3, as amended, sections 54, 56, 58, 59, 61, 187.

Any irregularity complained of or objection relied on:

14. None.

How the application is proposed to be heard or considered:

15. Before the Honourable Madam Justice K.M. Eidsvick, on the Commercial List.

AFFIDAVIT EVIDENCE IS REQUIRED IF YOU WISH TO OBJECT.

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 the 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.