

COURT FILE NUMBER Q.B. No. 733 of 2021

COURT OF QUEEN'S BENCH FOR SASKATCHEWAN

IN BANKRUPTCY AND INSOLVENCY

JUDICIAL CENTRE SASKATOON

APPLICANT ABBEY RESOURCES CORP.

**IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT, RSC*
1985, c C-36, AS AMENDED (THE "CCAA")**

AND

**IN THE MATTER OF A PROPOSED PLAN OF ARRANGEMENT FOR THE
CREDITORS OF ABBEY RESOURCES CORP. (THE "APPLICANT")**

AFFIDAVIT OF RICHARD MUDRY

I, Richard Mudry of the City of Calgary, in the Province of Alberta, make oath and say as follows:

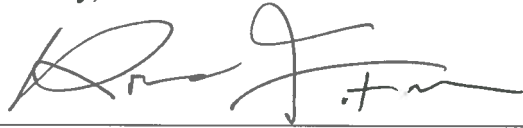
1. I am an Environmental Analyst with Indian Oil and Gas Canada (IOGC), and as such, I have personal knowledge of the facts and matters.
2. Carry the Kettle First Nation's (CTK) reserve lands are designated as environmentally sensitive by the Province of Saskatchewan. They are within the Shackleton Sand Hills, which is part of the Great Sand Hills ecosystem that extends south.
3. The Great Sand Hills is a very dry, mostly native prairie landscape with steep to gently rolling Aeolian sand hills. It is this rolling or dynamic quality of the sand dunes complexes along with the dry conditions that define this unique ecosystem and contribute to its fragile nature. Soils are sandy in texture, very well drained and highly susceptible to wind erosion.

Surface water bodies are few in number and ephemeral. Active or rolling sand dune complexes like this are rare in Canada.

4. Environmental impact assessment work was done between 2005 to 2007 and several species of plants, birds and mammals were identified as vulnerable to disturbances on CTK's reserve lands.
5. The four species of rare plants, which are identified as potentially vulnerable on the provincial Saskatchewan Conservation Data Centre (SCDC) tracking database, are the Small Lupine, Rough False Penny Royal, Linear-leaved Plantain and Low Milk-vetch. Small Lupine, Rough False Penny Royal and Linear-leaved Plantain are annuals that prefer eroding and/or exposed sites. Low Milk-vetch is a perennial legume that also prefers eroding and/or exposed sites.
6. Seven bird species on the CTK reserve lands that are listed by the *Species at Risk Act*, Committee on the Status of Endangered Wildlife in Canada, or Saskatchewan's *The Wildlife Act, 1998* are the Loggerhead Shrike, Sprague's Pipit, Common Nighthawk, Ferruginous Hawk, Long-billed Curlew, Yellow Rail and McCown's Longspur.
7. Another particularly vulnerable species on CTK's reserve lands is the Plains Spadefoot Toad. Saskatchewan's Ministry of Environment recommended a set-back of 90 metres from known wetlands used for breeding. The Ord's Kangaroo Rat and Dusky Dune Moth are two additional species that are rare in Canada and present in the Great Sand Hills ecosystem.
8. In sum, reclamation of the CTK reserve lands from the disturbance of Abbey Resources Corp.'s gas wells will be a complicated and lengthy process because it is part of the Great Sand Hills.
9. I make this affidavit in support of IOGC's position that the CTK reserve lands are an environmentally sensitive part of the Great Sand Hills.

[Signature page follows.]

Sworn before me at the City of Calgary, in)
the Province of Alberta, this 19 day of)
January, 2022)



Commissioner for Oaths for)
the Province of Alberta)
My appointment expires:)
Or being a Solicitor)



Richard Mudry

I, Kiran Fatima, certify that Richard Mudry has satisfied me
that he was the person entitled to affirm this affidavit.

CONTACT INFORMATION AND ADDRESS FOR SERVICE

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