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January 12, 2026

DELIVERED VIA EMAIL

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To the Honourable Justice Bourque  
c/o Calgary Commercial Coordinator  
Calgary Courts Centre  
601 5 Street SW  
Calgary, AB T2P 5P7

Attention: Justice Bourque

Dear Justice Bourque:

**RE: In the Matter of the Notice of Intention to Make a Proposal of Blue Sky Resources Ltd. – Action No.: B301-276975 – Hearing on the Calgary Commercial List on January 14, 2026 at 10:00 a.m.**

We are counsel to Cenovus Energy Inc. (“**Cenovus**”) in relation to the application of Canadian Natural Resources Limited (“**Canadian Natural**”) in the proceedings of Blue Sky Resources Ltd. (“**Blue Sky**”) under its Notice of Intention to Make a Proposal, which is returnable before you on January 14, 2026 at 10:00 a.m.

This letter comprises Cenovus’s reply to the Responding Written Submission of His Majesty the King in Right of Alberta as represented by the Minister of Energy and Minerals (“**Alberta Energy**”), which were delivered on January 9, 2026 (the “**Alberta Energy Brief**”).

Cenovus supports the arguments made by Canadian Natural in its Brief of Argument dated January 5, 2026, and the arguments set out in Canadian Natural’s Reply Brief dated January 12, 2026 (the “**CN Briefs**”). Cenovus’s reply submissions are limited to the following paragraph; otherwise, Cenovus relies on its submissions in its Bench Brief dated January 5, 2026.

At paragraph 93 of the Alberta Energy Brief, Alberta Energy submits that “Cenovus has failed to give notice of its constitutional argument as required”, citing to section 24 of the *Judicature Act*.<sup>1</sup> This provision is inapplicable because Cenovus is not seeking to have a provincial law held to be invalid, inapplicable or inoperative to the extent of its conflict with federal law. Rather, and in light of the statutory interpretation arguments set out in the CN Briefs and the Alberta Energy Brief, Cenovus relies on the doctrine of federal paramountcy for the proposition that *if* section

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<sup>1</sup> RSA 2000, c. J-2, s. 24

20(2.1) of the *Mines and Minerals Act*,<sup>2</sup> section 15 of the *Natural Gas Royalty Regulation*, 2009,<sup>3</sup> and section 16 of the *Natural Gas Royalty Regulation*, 2017<sup>4</sup> are interpreted as Alberta Energy suggests they should be, it will frustrate the BIA's valid legislative purpose of equitable distribution, as embodied in the *pari passu* principle and the single proceeding model. This further supports Canadian Natural's interpretation of section 20(2.1), section 15 of the 2009 NGGR and section 16 of the 2017 NGGR, which permits both pieces of legislation to co-exist without conflict.

Yours very truly,

LAWSON LUNDELL LLP



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cc: Service List

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<sup>2</sup> RSA 2000, c M-17, s. 20(2.1) [***MM***].

<sup>3</sup> Alta Reg 221/2008, s. 15 [**2009 NGGR**].

<sup>4</sup> Alta Reg 211/2016, s. 16 [**2017 NGGR**].