

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

<p>In re: Canadian Overseas Petroleum Limited, Debtor in a Foreign Proceeding.</p>	<p>Chapter 15 Case No. 24-[•] (•)</p>
<p>In re: COPL Technical Services Limited, Debtor in a Foreign Proceeding.</p>	<p>Chapter 15 Case No. 24-[•] (•)</p>
<p>In re: Canadian Overseas Petroleum (Ontario) Limited, Debtor in a Foreign Proceeding.</p>	<p>Chapter 15 Case No. 24-[•] (•)</p>
<p>In re: Canadian Overseas Petroleum (UK) Limited, Debtor in a Foreign Proceeding.</p>	<p>Chapter 15 Case No. 24-[•] (•)</p>
<p>In re: Canadian Overseas Petroleum (Bermuda Holdings) Limited, Debtor in a Foreign Proceeding.</p>	<p>Chapter 15 Case No. 24-[•] (•)</p>

<p>In re: Canadian Overseas Petroleum (Bermuda) Limited, Debtor in a Foreign Proceeding.</p>	<p>Chapter 15 Case No. 24-[•] (•)</p>
<p>In re: COPL America Holding Inc., Debtor in a Foreign Proceeding.</p>	<p>Chapter 15 Case No. 24-[•] (•)</p>
<p>In re: COPL America Inc., Debtor in a Foreign Proceeding.</p>	<p>Chapter 15 Case No. 24-[•] (•)</p>
<p>In re: Atomic Oil and Gas LLC, Debtor in a Foreign Proceeding.</p>	<p>Chapter 15 Case No. 24-[•] (•)</p>
<p>In re: Southwestern Production Corporation, Debtor in a Foreign Proceeding.</p>	<p>Chapter 15 Case No. 24-[•] (•)</p>
<p>In re: Pipeco LLC, Debtor in a Foreign Proceeding.</p>	<p>Chapter 15 Case No. 24-[•] (•)</p>

**MOTION OF AUTHORIZED FOREIGN REPRESENTATIVE
FOR ORDER DIRECTING JOINT ADMINISTRATION
OF CHAPTER 15 CASES AND GRANTING RELATED RELIEF**

Canadian Overseas Petroleum Limited (“COPL”), in its capacity as the duly-appointed foreign representative (the “Foreign Representative”) for the above-captioned debtors (collectively, the “Debtors” or the “Company”), in the proceedings (the “Canadian Proceedings”) currently pending before the Court of King’s Bench of Alberta in Calgary (the “Canadian Court”), initiated under the Companies’ Creditors Arrangement Act, R.S.C. 1985, c. C-36 (as amended, the “CCAA”), by and through its undersigned counsel, respectfully submits this motion (the “Motion”) for entry of an order, substantially in the form attached hereto as **Exhibit A**, (i) authorizing and directing the joint administration of the above-captioned chapter 15 cases (the “Chapter 15 Cases”) for procedural purposes only pursuant to section 105(a) of title 11 of the United States Code (the “Bankruptcy Code”), rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and rule 1015-1 of the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the District of Delaware (the “Local Rules”); (ii) authorizing the Foreign Representative to file and maintain a consolidated list of the information required under Bankruptcy Rule 1007(a)(4), substantially in the form attached hereto as **Exhibit B** (the “Consolidated 1007(a)(4) List”); authorizing the Foreign Representative to file and maintain a consolidated list of the information required under Local Rule 1007-2 (the “1007-2 List” and together with the Consolidated 1007(a)(4) List, the “Consolidated Lists”); and (iii) granting related relief.

In support of this Motion, the Foreign Representative relies upon the *Declaration of Peter Kravitz in Support of Debtors’ Verified Petition for (I) Recognition of Foreign Main Proceedings, (II) Recognition of Foreign Representative, and (III) Debtors’ Motion for Certain Provisional*

Relief (“Kravitz Declaration”)¹ filed concurrently with this Motion and incorporated herein by reference. In further support of the requested relief, the Foreign Representative respectfully states as follows:

RELIEF REQUESTED

1. By this Motion, the Foreign Representative seeks entry of an order authorizing and directing the joint administration of the Chapter 15 Cases for procedural purposes only.
2. The Foreign Representative also requests that the caption of the Chapter 15 Cases be modified to reflect the joint administration of the Chapter 15 Cases (including the accompanying footnote), substantially as follows:

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: Canadian Overseas Petroleum Limited, <i>et al.</i> , ¹ Debtors in a foreign proceeding.	Chapter 15 Case No. 24-[•] (•) (Jointly Administered)
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¹ The Debtors in these chapter 15 proceedings, together with the last four digits of their business identification numbers are: Canadian Overseas Petroleum Limited (8749); COPL Technical Services Limited (1656); Canadian Overseas Petroleum (Ontario) Limited (8319); Canadian Overseas Petroleum (UK) Limited (7063); Canadian Overseas Petroleum (Bermuda Holdings) Limited (N/A); Canadian Overseas Petroleum (Bermuda) Limited (N/A); COPL America Holding Inc. (1334); COPL America Inc. (9018); Atomic Oil and Gas LLC (8233); Southwestern Production Corporation (8694); and Pipeco LLC (XXXX). The location of the Debtors’ headquarters and the Debtors’ duly appointed foreign representative is 715 5 Avenue SW, Suite 3200, Calgary, Alberta T2P 2X6, Canada.

3. The Foreign Representative submits that the proposed caption satisfies the requirements of section 342(c)(1) of the Bankruptcy Code and Bankruptcy Rules 1005 and 2002(n).

¹ Capitalized terms used, but not otherwise defined herein shall have the meaning given to them in the Kravitz Declaration.

4. In addition, the Foreign Representative requests that the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”) authorize and direct that the following notation be entered on the docket for each of the Debtor’s Chapter 15 Cases, except in the case of Canadian Overseas Petroleum Limited, to reflect the joint administration of these Chapter 15 Cases:

An order has been entered in this case directing the joint administration of the chapter 15 cases of: Canadian Overseas Petroleum Limited (8749); COPL Technical Services Limited (1656); Canadian Overseas Petroleum (Ontario) Limited (8319); Canadian Overseas Petroleum (UK) Limited (7063); Canadian Overseas Petroleum (Bermuda Holdings) Limited (N/A); Canadian Overseas Petroleum (Bermuda) Limited (N/A); COPL America Holding Inc. (1334); COPL America Inc. (9018); Atomic Oil and Gas LLC (8233); Southwestern Production Corporation (8694); and Pipeco LLC (XXXX). All further pleadings and other papers shall be filed, and all further docket entries shall be made, in Case No. 24-[•] (•), and such docket should be consulted for all matters affecting these chapter 15 cases.

5. Further, the Foreign Representative requests that the Bankruptcy Court authorize the Foreign Representative to file the Consolidated 1007(a)(4) List of foreign proceeding administrators and maintain with the proposed Monitor a consolidated list of (a) the parties to litigation pending in the United States involving any of the Debtors and (b) all persons and entities against whom the Foreign Representative seeks provisional relief pursuant to section 1519 of the Bankruptcy Code, to be available to the Debtors’ creditors and parties in interest upon request.

6. The Foreign Representative also requests that the Bankruptcy Court authorize the Foreign Representative to file and maintain a consolidated 1007-2 List of creditors and their addresses.

7. Finally, the Foreign Representative seeks authority to send combined notices to the Debtors’ creditors and other parties in interest, where appropriate.

JURISDICTION AND VENUE

8. This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference of the United States District Court for the District of Delaware*, dated February 29, 2012.

9. The Foreign Representative has properly commenced these Chapter 15 Cases under sections 1504, 1509, and 1515 of the Bankruptcy Code. This is a core proceeding under 28 U.S.C. § 157(b)(2).

10. Venue for these cases is proper in this Court under 28 U.S.C. § 1410 because COPL has its principal assets in the United States—its equity ownership in COPL America Holdings, Inc., a Delaware corporation—located in Delaware. Each Debtor also has an interest in a retainer on deposit with Potter Anderson & Corroon LLP, in which each Debtor has an ownership interest. These funds are held in a bank account at Wells Fargo Bank, N.A. in accordance with Delaware Rule of Professional Responsibility 1.5. *See* Kravitz Decl. ¶ 54.

11. As required by Bankruptcy Rule 7008 and Local Rule 9013-1(f), the Foreign Representative consents to the entry of final orders or judgments by the Bankruptcy Court if it is later determined that the Bankruptcy Court, absent consent of the parties, cannot enter final orders or judgments consistent with article III of the United States Constitution.

12. The statutory predicates for the relief requested herein are section 105(a) of the Bankruptcy Code, Bankruptcy Rule 1015(b) and Local Rule 1015-1.

BACKGROUND

13. On March 8, 2024, the Debtors commenced the Canadian Proceedings under the CCAA to implement an agreed-upon restructuring and commence a sale process under the supervision of the Canadian Court. On the same day, the Canadian Court entered an initial order

(the “Initial Order”) appointing KSV Restructuring Inc. as monitor (the “Monitor”) in the Canadian Proceedings and authorizing COPL to act as Foreign Representative of the Debtors.

14. On the date hereof (the “Petition Date”), the Foreign Representative filed petitions under chapter 15 of the Bankruptcy Code for recognition of the Canadian Proceedings, thereby commencing the Debtors’ Chapter 15 Cases.

15. The Foreign Representative anticipates that the Canadian Court will enter an amended and restated Initial Order on or around March 18, 2024.

16. Further detail regarding the Debtors’ business and the events leading to the Canadian Proceedings and prompting the filing of these Chapter 15 Cases can be found in the Kravitz Declaration.

BASIS FOR RELIEF REQUESTED

17. Bankruptcy Rule 1015(b) provides that if two or more petitions are pending in the same court by or against a debtor and an affiliate, the court may order joint administration of the cases. The Debtors are “affiliates” as that term is defined under section 101(2) of the Bankruptcy Code. In particular, all of the Debtors are under 100% direct or indirect common ownership and control of COPL.

18. Additionally, Local Rule 1015-1 provides that this Bankruptcy Court may order joint administration without notice or a hearing upon the filing of a motion requesting such joint administration and an affidavit or verification establishing that joint administration is warranted and will ease the administrative burden for the Bankruptcy Court and the parties.

19. The Kravitz Declaration establishes that joint administration of the Chapter 15 Cases is warranted because: (i) the Debtors are under 100% direct or indirect common ownership and control and are therefore affiliates under section 101(2) of the Bankruptcy Code, (ii) the

Debtors' financial affairs and business operations are closely related, and (iii) it will ease the administrative burden of such cases on the Bankruptcy Court and parties in interest.

20. The Foreign Representative anticipates that the various notices, motions, hearings, orders and other pleadings in the Chapter 15 Cases will affect all of the Debtors. With numerous affiliated Debtors, each with its own chapter 15 case docket, there would be numerous duplicative pleadings filed and served for each issue if the Chapter 15 Cases were not jointly administered. Such duplication of substantially identical documents would be wasteful and would unnecessarily burden the Clerk of this Bankruptcy Court.

21. Joint administration will permit the Clerk to use a single docket for all of the Debtors' Chapter 15 Cases and to combine notices to creditors and other parties in interest of the respective Debtors. Joint administration also will protect parties in interest in these Chapter 15 Cases by ensuring that parties and the Foreign Representative will stay apprised of the various matters before the Bankruptcy Court in all of the cases. The Foreign Representative submits that use of the simplified caption, in the form set forth above, by all parties in interest will eliminate cumbersome and confusing procedures and ensure uniformity of pleading identification.

22. The rights of the respective creditors of each of the Debtors will not be adversely affected by joint administration of the Chapter 15 Cases, as the relief sought by this Motion is purely procedural and not intended to affect substantive rights. Each creditor and party in interest will maintain whatever rights or claims it has against the particular Debtor(s), if any. Indeed, the rights of all creditors will be enhanced by the reduction in costs resulting from joint administration. The Bankruptcy Court and the Clerk also will be relieved of the burden of entering duplicative orders and keeping duplicative files, and supervision of the administrative aspects of these cases by the Office of the United States Trustee will be simplified.

23. Additionally, maintaining the Consolidated Lists under Bankruptcy Rule 1007(a)(4) and Local Rule 1007-2 is appropriate in these cases. As the provisional and final relief sought in each of these cases is identical and any additional relief sought is likely to impact all of the Debtors, the Foreign Representative anticipates that the motions, notices, hearings, orders and other papers filed in these Chapter 15 Cases will affect all of the Debtors. Under these circumstances, filing and maintaining separate lists under Bankruptcy Rule 1007(a)(4) and Local Rule 1007-2 would result in unnecessary confusion and wasteful duplication of effort and service.

NOTICE

24. The Foreign Representative respectfully requests that the Bankruptcy Court grant this Motion without notice. The Foreign Representative will serve notice of entry of the order in accordance with the procedures set forth in the contemporaneously filed *Foreign Representative's Motion for Order (A) Scheduling Hearing on Recognition of Chapter 15 Petition, (B) Specifying Form and Manner of Service of Notice, and (C) Authorizing Redaction of Certain Personally Identifiable Information of Individual Stakeholders*. In light of the nature of the relief requested, the Foreign Representative requests that the Bankruptcy Court find that no further notice is required.

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CONCLUSION

WHEREFORE, the Foreign Representative respectfully requests that the Bankruptcy Court enter an order, substantially in the form attached as **Exhibit A**, (i) authorizing the joint administration of the Chapter 15 Cases, (ii) authorizing the Foreign Representative to file the Consolidated Lists, and (iii) granting such other and further relief as this Bankruptcy Court deems just and proper.

Dated: March 11, 2024
Wilmington, Delaware

Respectfully submitted,

/s/ L. Katherine Good

Christopher M. Samis (No. 4909)

L. Katherine Good (No. 5101)

Gregory J. Flasser (No. 6154)

Levi Akkerman (No. 7015)

POTTER ANDERSON & CORROON LLP

1313 N. Market Street, 6th Floor

Wilmington, Delaware 19801

Telephone: (302) 984-6000

Facsimile: (302) 658-1192

Email: csamis@potteranderson.com

kgood@potteranderson.com

gflasser@potteranderson.com

lakkerman@potteranderson.com

Counsel to the Foreign Representative

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Canadian Overseas Petroleum Limited, *et al.*,¹
Debtors in a foreign proceeding.

Chapter 15

Case No. 24-[]()

(Joint Administration Requested)

Re: Docket No. __

**ORDER DIRECTING JOINT ADMINISTRATION
OF CHAPTER 15 CASES AND GRANTING RELATED RELIEF**

Upon the *Motion of Authorized Foreign Representative for Order Directing Joint Administration of Chapter 15 Cases and Granting Related Relief* (the “Motion”) of Canadian Overseas Petroleum Limited (the “Foreign Representative”), in its capacity as the Canadian Court-appointed and duly-authorized Foreign Representative for the above-captioned debtors (collectively, the “Debtors”) for entry of an order (this “Order”), (i) directing the joint administration of the Debtors’ related chapter 15 cases (the “Chapter 15 Cases”) pursuant to section 105(a) of the Bankruptcy Code, Bankruptcy Rule 1015(b) and Local Rule 1015-1, (ii) authorizing the Foreign Representative to file a consolidated list pursuant to Bankruptcy Rule 1007(a)(4) and a consolidated list pursuant to Local Rule 1007-2, and (iii) granting related relief; and upon consideration of the Kravitz Declaration; and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(P); and venue being proper before this court (“Bankruptcy Court”) pursuant to 28 U.S.C. § 1410; and the Bankruptcy Court having jurisdiction to consider the Motion and the relief requested therein in accordance

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with 28 U.S.C. §§ 157 and 1334; and due and proper notice of the Motion and hearing, if necessary, to consider the relief requested herein appearing adequate and appropriate under the circumstances; and this Bankruptcy Court having found that no other or further notice need be provided; and the legal and factual bases set forth in the Motion establishing just and sufficient cause to grant the requested relief; and the relief granted by this Order being in the best interests of the Debtors, their creditors and all parties in interest; and upon all of the proceedings before the Bankruptcy Court and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. Pursuant to Bankruptcy Rule 1015(b), the Chapter 15 Cases shall be jointly administered and consolidated for procedural purposes only.
3. The Clerk of the Bankruptcy Court shall maintain one file and one docket for the Chapter 15 Cases, which file and docket for all these Chapter 15 Cases shall be the file and docket for Canadian Overseas Petroleum Limited, Case No. 24-[] ().
4. All pleadings and other papers filed in these Chapter 15 Cases shall bear a consolidated caption, including the accompanying footnote, in the following form:

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Canadian Overseas Petroleum Limited, *et al.*,¹

Debtors in a foreign proceeding.

Chapter 15

Case No. 24-[•] (•)

(Jointly Administered)

¹ The Debtors in these chapter 15 proceedings, together with the last four digits of their business identification numbers are: Canadian Overseas Petroleum Limited (8749); COPL Technical Services Limited (1656); Canadian Overseas Petroleum (Ontario) Limited (8319); Canadian Overseas Petroleum (UK) Limited (7063); Canadian Overseas Petroleum (Bermuda Holdings) Limited (N/A); Canadian Overseas Petroleum (Bermuda) Limited (N/A); COPL America Holding Inc. (1334); COPL America Inc. (9018); Atomic Oil and Gas LLC (8233); Southwestern Production Corporation (8694); and Pipeco LLC (XXXX). The location of the Debtors' headquarters and the Debtors' duly appointed foreign representative is 715 5 Avenue SW, Suite 3200, Calgary, Alberta T2P 2X6, Canada.

5. The foregoing caption satisfies the requirements set forth in section 342(c) of the Bankruptcy Code and Bankruptcy Rules 1005 and 2002(n) in all respects.

6. The Clerk of the Bankruptcy Court shall make a docket entry in each of the Chapter 15 Cases other than Canadian Overseas Petroleum Limited substantially as follows:

An order has been entered in this case directing the joint administration of the chapter 15 cases of: Canadian Overseas Petroleum Limited (8749); COPL Technical Services Limited (1656); Canadian Overseas Petroleum (Ontario) Limited (8319); Canadian Overseas Petroleum (UK) Limited (7063); Canadian Overseas Petroleum (Bermuda Holdings) Limited (N/A); Canadian Overseas Petroleum (Bermuda) Limited (N/A); COPL America Holding Inc. (1334); COPL America Inc. (9018); Atomic Oil and Gas LLC (8233); Southwestern Production Corporation (8694); and Pipeco LLC (XXXX). All further pleadings and other papers shall be filed, and all further docket entries shall be made, in Case No. 24-[•] (•), and such docket should be consulted for all matters affecting these chapter 15 cases.

7. Nothing contained in the Motion or this Order shall be deemed or construed as directing or otherwise effecting a substantive consolidation of the Chapter 15 Cases.

8. The Foreign Representative is authorized to file a consolidated list of the information required by Bankruptcy Rule 1007(a)(4), substantially in the form annexed to the Motion as Exhibit B.

9. The Foreign Representative is authorized to file a consolidated list of the information required by Local Rule 1007-2.

10. The Foreign Representative is authorized to take all actions it deems necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion.

11. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry, and the Clerk is hereby directed to enter this Order on the docket in the chapter 15 case of each of the Debtors.

12. This Bankruptcy Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation and/or enforcement of this Order.

EXHIBIT B

Consolidated 1007(a)(4) List

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Canadian Overseas Petroleum Limited, *et al.*,¹

Debtors in a foreign proceeding.

Chapter 15

Case No. 24-[]()

(Joint Administration Requested)

**LIST PURSUANT TO RULE 1007(a)(4) OF THE
FEDERAL RULES OF BANKRUPTCY PROCEDURE AND
STATEMENT PURSUANT TO BANKRUPTCY CODE SECTION 1515(c)**

Canadian Overseas Petroleum Limited (“COPL”), in its capacity as the duly-appointed foreign representative (the “Foreign Representative”) for the above-captioned debtors (collectively, the “Debtors” or the “Company”), in the proceedings (the “Canadian Proceedings”) currently pending before the Court of King’s Bench of Alberta in Calgary (the “Canadian Court”), initiated under the Companies’ Creditors Arrangement Act, R.S.C. 1985, c. C-36 (as amended, the “CCAA”), respectfully represents:

I. Administrator in Foreign Proceedings Concerning the Debtors

COPL is the Court-appointed foreign representative (the “Foreign Representative”) in the Canadian Proceedings. KSV Restructuring Inc. is the Court-appointed monitor (the “Monitor”) in the Canadian Proceedings. The Foreign Representative believes that, other than the Canadian Proceedings, there are no foreign proceedings pending with respect to the Debtors.

The Foreign Representative’s Address is:

Canadian Overseas Petroleum Limited
715-5 Avenue SW

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Suite 3200
Calgary, Alberta T2P 2X6

The Monitor's address is:

KSV Restructuring Inc.
220 Bay Street
13th Floor, PO Box 20
Toronto, Ontario M5J 2W4

II. All Parties to Litigation Pending in the United States in which a Debtor is a Party at the Time of Filing of the Chapter 15 Petitions

- None.

III. Entities Against Whom Provisional Relief is Sought Pursuant to 11 U.S.C. § 1519

See attached **Schedule 1**.

IV. Corporate Ownership Statement Pursuant to Rules 1007(a) and 7007 of the Federal Rules of Bankruptcy Procedure

Pursuant to Rules 1007(a) and 7007.1 of the Federal Rules of Bankruptcy Procedure, the Foreign Representative submits the following list of entities that hold ownership interests in the Debtors:

A. Canadian Overseas Petroleum Limited

COPL is a publicly held company and its shares are traded on the Canadian Stock Exchange under the symbol "XOP" and the London Stock Exchange under the symbol "COPL." The following entities own of 10% or more of COPL's ownership interests:

- Anavio Capital Partners LLP – 20.44%

B. COPL Technical Services Limited

COPL owns 100% of the ownership interests of COPL Technical Services Limited.

C. Canadian Overseas Petroleum (UK) Limited

COPL owns 100% of the ownership interests of Canadian Overseas Petroleum (UK) Limited.

D. Canadian Overseas Petroleum (Bermuda Holdings) Limited

COPL owns 100% of the ownership interests of Canadian Overseas Petroleum (Bermuda Holdings) Limited.

E. Canadian Overseas Petroleum (Bermuda) Limited

Canadian Overseas Petroleum (Bermuda Holdings) Limited owns 100% of the ownership interests of Canadian Overseas Petroleum (Bermuda) Limited.

F. Canadian Overseas Petroleum (Ontario) Limited

COPL owns 100% of the ownership interests of Canadian Overseas Petroleum (Ontario) Limited.

G. COPL America Holding Inc.

COPL owns 100% of the ownership interests of COPL America Holding Inc.

H. COPL America Inc.

COPL America Holding Inc. owns 100% of the ownership interests of COPL America Inc.

I. Atomic Oil and Gas LLC

COPL America Inc. owns 100% of the ownership interests of Atomic Oil and Gas LLC.

J. Pipeco LLC

Atomic Oil and Gas LLC owns 100% of the ownership interests of Pipeco LLC.

K. Southwestern Production Corp.

COPL America Inc. owns 100% of the ownership interests of Southwestern Production Corporation.

V. **Statement Pursuant to 11 U.S.C. § 1515(c) Identifying All Foreign Proceedings With Respect to the Debtors that Are Known to the Foreign Representative**

The Foreign Representative is aware of the following foreign proceedings with respect to the Debtors: (i) the insolvency proceeding before the Court of King's Bench of Alberta in Calgary, Alberta, Canada, with file number CV-24-1252079.

DECLARATION UNDER PENALTY OF PERJURY

I, Peter Kravitz, am the Chief Restructuring Officer and an authorized signatory of the foreign representative, Canadian Overseas Petroleum Limited, in these chapter 15 cases. In such capacity, I am familiar with the operations and financial affairs of the Debtors. I declare under penalty of perjury under the laws of the United States of America that any information provided in the foregoing “List Pursuant to Rule 1007(a)(4) of the Federal Rules of Bankruptcy Procedure and Statement Pursuant to Bankruptcy Code Section 1515(c)” is true and correct to the best of my knowledge, information, and belief, with reliance on appropriate corporate officers.

Dated: March 11, 2024

/s/ Peter Kravitz

Peter Kravitz

Chief Restructuring Officer of Canadian
Overseas Petroleum Limited

SCHEDULE 1**Entities Against Whom Provisional Relief is Sought Pursuant to 11 U.S.C. 1519**

Aleksandra Owad
Alpha Flowback Corp.
Altitude Communications
American Mobile Research, Inc.
American Tubular Inspection, Inc.
Anavio Capital Partners LLP
Baker Hughes
Blakeman Propane Inc
Bondegard Enterprises LLC
BP Energy Company
Brent's Pumping Service
Brown Drew Massey & Durham LLP
Cavalcanti Hume Funfer Inc
Cameron International Corp
Central Wyoming Production Services
Chubb
Circuit Trucking, LLC
Cole Creek Sheep Company
Computershare
Converse County Treasurer
Convertible Bonds
CS Consulting LLC
Cuesta Energy Inc.
Culligan
Davis Graham & Stubbs LLP
De Lage Landed Financial Services Canada
Deloitte LLP
Dragon Products PES, Inc.
Eagle Coiled Tubing LLC
ECI Industries LLC
ECI LLC
Edison Investments Research Ltd
Elite Oil Field Services LLC
Energy Laboratories Inc
EquipmentShare.com, Inc
Ernst & Young LLP
Deferal Express
Dield LLP
G-Fab Welding LLC
Gravity Power & Rental LLC

Great Plains Analytical Services Inc
Harbison-Fischer, Inc
HP Oilfield Services, LLC
IFS Energy And Resources Canada LLC
IKON Science Limited
International Reservoir Technologies Inc
Iron Mountain Inc
J&H COMMUNICATIONS
Jacam Catalyst, LLC
Jack Pratt Screen-Ad Co
Johnson Matthey Inc. DBA Tracerco
JRB Trucking, LLC
Kenyon Trucking
Key Energy Services
KLX Energy Services, LLC
Liberty Communications
London Stock Exchange
MAC Property Services
McMahon Energy Partners LP
Meghan M Babcock
Minnelusa Solutions LLC
Montana Fluid Solutions, LLC
Northstar Energy
Northwest Contractors Supply
NOV Tuboscope
Panhandle Oilfield Service Companies Inc.
Paradigm Hydraulics LLC
Parkerton Ranch Inc
PC Transport Inc
PEAK ADVISORY LTD
Precision Service Equipment LLC
Proactive Investors UK LTD
Ranger Energy Services
Receiver General
Republic Services
Road Runner Service & Supply, LLC
Rocky Mountain Energy Solutions Inc
Rocky Mountain Oilfield Warehouse
Rocky Mtn Power
ROGERS DATA CENTRES
RPS Well Service, LLC
Ryder Scott Company LP
Shaw Business
State of Wyoming
Summit Partners

TCRI Energy Services, Inc
The Armchair Trader
The Cavins Corporation
Thinktel Communications
TNT Hydroline Inc
Tofte Energy Partners, Limited
UELS LLC
U-Know Service LLC
Unit 3 Tech, LLC
Vencer Group Inc.
Vox Markets
Wild West Construction LLC
Williams Scotsman, Inc
Wyoming Machinery Company
Yellow Jersey