

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

In re: SANJEL (USA) INC., Debtor in a foreign proceeding.	§ § § § §	Case No. 16-50778 Chapter 15
In re: SANJEL CORPORATION, Debtor in a foreign proceeding.	§ § § § §	Case No. 16-50784 Chapter 15
In re: SURETECH GROUP LTD., Debtor in a foreign proceeding.	§ § § § §	Case No. 16-50786 Chapter 15
In re: SANJEL ENERGY SERVICES (USA) INC., Debtor in a foreign proceeding.	§ § § § §	Case No. 16-50795 Chapter 15
In re: SURETECH COMPLETIONS (USA) INC., Debtor in a foreign proceeding.	§ § § § §	Case No. 16-50789 Chapter 15
In re: SANJEL CAPITAL (USA) INC., Debtor in a foreign proceeding.	§ § § § §	Case No. 16-50783 Chapter 15
In re: TERRACOR GROUP LTD., Debtor in a foreign proceeding.	§ § § § §	Case No. 16-50790 Chapter 15
In re: TERRACOR (USA) INC., Debtor in a foreign proceeding.	§ § § § §	Case No. 16-50791 Chapter 15
In re: TERRACOR RESOURCES (USA) INC., Debtor in a foreign proceeding.	§ § § § §	CASE NO. 16-50793 Chapter 15
In re: TERRACOR LOGISTICS (USA) INC., Debtor in a foreign proceeding.	§ § § § §	CASE NO. 16-50794 Chapter 15 Joint Administration Pending



DECLARATION OF PAUL CRILLY IN SUPPORT OF (A) EMERGENCY EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER AND RELIEF PURSUANT TO SECTIONS 105(A) AND 1519 OF THE BANKRUPTCY CODE, (B) EXPEDITED PETITION FOR RECOGNITION AS FOREIGN MAIN PROCEEDING PURSUANT TO SECTIONS 1515 AND 1517 OF THE UNITED STATES BANKRUPTCY CODE AND RELATED RELIEF, AND (C) MOTION FOR AN ORDER (I) SPECIFICALLY RECOGNIZING CANADIAN COURT ORDER AUTHORIZING DEBTORS TO BORROW UNDER A POST-PETITION CREDIT FACILITY, (II) APPROVING LIENS ON ASSETS LOCATED IN THE TERRITORIAL JURISDICTION OF THE UNITED STATES, AND (III) GRANTING ADEQUATE PROTECTION TO PRE-PETITION SECURED PARTIES

I, Paul Crilly, declare as follows:

1. I am the Chief Financial Officer and Chief Restructuring Officer for Sanjel Corporation, the parent corporation of the above-captioned debtors (collectively, the “*Chapter 15 Debtors*”).

2. I am a resident of Calgary, Alberta, Canada, over eighteen (18) years of age, and am competent to testify to the matters stated herein based upon personal knowledge, except for those matters stated upon information and belief, and to those matters, I believe them to be true.

3. I have full authority to verify the chapter 15 petitions for recognition of a foreign proceeding, including each of the attachments and appendices thereto.

4. I have reviewed (a) the *Emergency Ex Parte Application for Temporary Restraining Order and Relief Pursuant to Sections 105(a) and 1519 of the Bankruptcy Code*, (b) the *Expedited Petition for Recognition as Foreign Main Proceeding Pursuant to Sections 1515 and 1517 of the United States Bankruptcy Code and Related Relief*, and (c) the *Motion for an Order (I) Specifically Recognizing Canadian Court Order Authorizing Debtors to Borrow Under a Post-Petition Credit Facility, (II) Approving Liens on Assets Located in the Territorial Jurisdiction of the United States, and (III) Granting Adequate Protection to Pre-Petition Secured*


Parties and verify that the facts as stated therein are true and correct to the best of my knowledge and belief.

5. I also make this Declaration to certify that the facts as stated in my affidavit (the *Affidavit of Paul Crilly*) made in support of the application by Sanjel Corporation and certain of its affiliates for an order under the *Canadian Companies Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended, are true and correct to the best of my knowledge and belief.

6. A true and correct copy of the Initial Order entered by the Court of Queen's Bench of Alberta, Judicial Centre of Calgary, as well as the applications and exhibits filed with respect thereto, are attached to the *Notice of Filing of Documents in Support of First Day Filings*.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Signed: March 31, 2016.

/s/ 
Paul Crilly
CFO and CRO for Sanjel Corporation