



COURT FILE NUMBER      **1801 – 16746**

COURT                      **COURT OF QUEEN'S BENCH OF ALBERTA**

JUDICIAL CENTRE        **CALGARY**

PLAINTIFFS              **ALTIUS ROYALTY CORPORATION, GENESEE ROYALTY LIMITED PARTNERSHIP and GENESEE ROYALTY GP INC.**

DEFENDANTS             **HER MAJESTY THE QUEEN IN RIGHT OF ALBERTA and ATTORNEY GENERAL OF CANADA**

DOCUMENT               **RESPONSE TO REQUEST FOR PARTICULARS**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT      **Code Hunter LLP  
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**TAKE NOTICE THAT** the Plaintiffs, ALTIUS ROYALTY CORPORATION, GENESEE ROYALTY LIMITED PARTNERSHIP and GENESEE ROYALTY GP INC., hereby reply to the Request for Particulars of the Defendant, ATTORNEY GENERAL OF CANADA, as follows:

1. In response to paragraph 1 of the Request for Particulars (the "**Request**"), the Government of Canada maintained and held out its jurisdiction as having consistent environmental policies with changes in the governing parties by enacting the *Reduction of Carbon Dioxide Emissions from Coal-fired Generation of Electricity Regulations*, SOR/2012-167 (the "**Regulations**"), which established a long-term regime for the phase out of traditional coal-fired electrical generation in Canada. Additionally, in purchasing the royalty interest through Genesee Royalty Limited Partnership ("**Genesee LP**"), Altius Royalty Corporation ("**Altius Royalty**") understood that Canada:
  - (a) was one of the world's top destinations for investments in the mining industry;
  - (b) was politically stable;
  - (c) was one of the most economically free jurisdictions in the world;

- (d) had a highly competitive business and tax environment;
- (e) was projected to continue its strong economic growth;
- (f) respected property rights;
- (g) had transparent expropriation laws and fair awards of resulting compensation; and
- (h) had a settled regulatory framework for coal-fired electrical generation.

2. In response to paragraph 2 of the Request:

- (a) Prairie Mines & Royalty ULC ("**Prairie Mines**") has title to the coal in which Genesee LP has its royalty interest.
- (b) The legal descriptions of the lands which correspond to the royalty interest of Genesee LP are listed in the attached Schedule "A".
- (c) The names of the parties to the lease, permit, licence, or approval (if any) that exist with the title holder to the coal which is related to the royalty interest, and the dates thereof, are not known to the Plaintiffs.
- (d) The parties to the Arrangement Agreement dated 24 December 2013 are as follow:
  - i. Westmoreland Coal Company;
  - ii. Westmoreland Canada Holdings Inc.;
  - iii. Altius Minerals Corporation;
  - iv. Altius Prairie Royalties Corp. (now Altius Royalty);
  - v. Sherritt International Corporation;
  - vi. 1683740 Alberta Ltd.;
  - vii. 1836774 Ontario Limited;
  - viii. Prairie Mines & Royalty Ltd. (now Prairie Mines); and
  - ix. Coal Valley Resources Inc.

- (e) Prairie Mines is the entity which is obligated to pay the royalties to Genesee LP.
- (f) Genesee LP has a legal and beneficial interest in the royalty interest, which it acquired on 28 April 2014 from Prairie Mines by assignment under contract.
- (g) Genesee Royalty GP Inc. ("**Genesee GP**") does not have an interest in the royalty interest.
- (h) Altius Royalty does not have an interest in the royalty interest.

3. In response to paragraph 3 of the Request:

- (a) The joint venture is between Capital Power L.P. ("**Capital Power**") and Prairie Mines for the purpose of operating the Genesee Coal Mine.
- (b) To the best of the Plaintiffs' information, Capital Power has freehold and leasehold interests in certain coal of the Genesee Coal Mine.
- (c) Prairie Mines has freehold and leasehold interests in certain coal of the Genesee Coal Mine, including the coal described in the attached Schedule "A".
- (d) Genesee LP's interest in the Genesee Coal Mine is the royalty interest, the particulars for which are set out in paragraphs 2(a)(b) and (f) of this Response.

4. In response to paragraph 4 of the Request:

- (a) The 24 April 2014 Second Amended and Restated Genesee Coal Mine Dedication and Unitization Agreement, as amended, defines or describes the following terms as such:
  - i. Joint Venture: The joint venture between Capital Power and Prairie Mines for the purpose of operating the Genesee Coal Mine.
  - ii. PMRL: Prairie Mines & Royalty Ltd., now Prairie Mines.
  - iii. Third Parties: A person other than a party, or affiliate of a party, to the agreement.
  - iv. The Royalty Owner: Genesee LP.

- v. Royalty Interest: The rights, obligations, and liabilities of Genesee LP pursuant to the Genesee Royalty Agreement of 24 April 2014 between Prairie Mines and Genesee LP evidencing the legal and beneficial interest of Genesee LP in the coal of Prairie Mines.

5. In response to paragraph 5 of the Request:

- (a) The mineral rights of Genesee LP as referenced in paragraph 34 of the Amended Statement of Claim (the "**Amended Claim**") are the royalty interest, the particulars of which are set out in paragraphs 2(a)(b) and (f) of this Response.
- (b) Neither Genesee GP nor Altius Royalty hold mineral rights in the Genesee Coal Mine.
- (c) Genesee LP holds 100% of the royalty interest in the freehold coal of Prairie Mines which supplies the Genesee Power Plant.

6. In response to paragraph 6 of the Request, see paragraph 1 of this Response.

7. In response to paragraph 7 of the Request, see paragraph 1 of this Response.

8. In response to paragraph 8 of the Request:

- (a) The royalty interest of Genesee LP is the specific property interest that the Defendants have taken.
- (b) The benefits that the Government of Canada will obtain are of the sort set out in the "Regulatory Impact Analysis Statement" referenced at paragraph 39 of the Amended Claim. For further particulars, discovery is required as that information is within the Defendants' knowledge.
- (c) Genesee LP has been deprived of all rights of use and enjoyment of its royalty interest, as the coal which is mined and used to fuel the Genesee Power Plant has been sterilized and rendered of no value.
- (d) The specific acts of the Government of Canada which prevent Genesee LP from using and enjoying its royalty interest are set out at paragraphs 36 to 39 of the Amended Claim.

# SCHEDULE "A"

1. FIRST

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 3  
QUARTER NORTH WEST  
AND THE RIGHT TO WORK THE SAME  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

SECOND

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 3  
QUARTER NORTH EAST  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

THIRD

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 3  
QUARTER SOUTH WEST  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

FOURTH

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 3  
QUARTER SOUTH EAST  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

2. FIRST

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 5  
QUARTER NORTH WEST  
AND THE RIGHT TO WORK THE SAME  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

SECOND

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 5  
QUARTER NORTH EAST  
AND THE RIGHT TO WORK THE SAME  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

THIRD

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 5  
QUARTER SOUTH WEST  
AREA: 64.3 HECTARES (159 ACRES) MORE OR LESS

FOURTH

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 5  
QUARTER SOUTH EAST  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

3. \*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 7  
QUARTER NORTH WEST  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

4. \*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 7  
QUARTER NORTH EAST  
AND THE RIGHT TO WORK THE SAME  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

5. FIRST

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 9  
QUARTER NORTH WEST  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

SECOND

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 9  
QUARTER NORTH EAST  
AND THE RIGHT TO WORK THE SAME  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

THIRD

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 9  
QUARTER SOUTH WEST  
AND THE RIGHT TO WORK THE SAME  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

FOURTH

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 9  
QUARTER SOUTH EAST  
AND THE RIGHT TO WORK THE SAME  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

6. FIRST

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 15  
QUARTER NORTH WEST  
AND THE RIGHT TO WORK THE SAME  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

SECOND

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 15  
QUARTER NORTH EAST  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

THIRD

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 15  
QUARTER SOUTH WEST  
AND THE RIGHT TO WORK THE SAME  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

FOURTH

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 15  
QUARTER SOUTH EAST  
AND THE RIGHT TO WORK THE SAME  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

7. FIRST

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 17  
QUARTER NORTH WEST  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

SECOND

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 17  
QUARTER NORTH EAST  
AND THE RIGHT TO WORK THE SAME  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

THIRD

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 17  
QUARTER SOUTH WEST  
AND THE RIGHT TO WORK THE SAME  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

FOURTH

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 17  
QUARTER SOUTH EAST  
AND THE RIGHT TO WORK THE SAME  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

8. FIRST

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 19  
QUARTER NORTH WEST  
AND THE RIGHT TO WORK THE SAME  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

SECOND

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 19  
QUARTER NORTH EAST  
AND THE RIGHT TO WORK THE SAME  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

THIRD

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 19  
QUARTER SOUTH WEST  
AND THE RIGHT TO WORK THE SAME  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

FOURTH

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 19  
QUARTER SOUTH EAST  
AND THE RIGHT TO WORK THE SAME  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

9. FIRST

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 21  
QUARTER NORTH WEST  
AND THE RIGHT TO WORK THE SAME  
AREA: 64.3 HECTARES (159 ACRES) MORE OR LESS

SECOND

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 21  
QUARTER NORTH EAST  
AND THE RIGHT TO WORK THE SAME  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

THIRD

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 21  
QUARTER SOUTH WEST  
AND THE RIGHT TO WORK THE SAME  
AREA: 64.3 HECTARES (159 ACRES) MORE OR LESS

FOURTH

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 21  
QUARTER SOUTH EAST  
AND THE RIGHT TO WORK THE SAME  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

10. \*ALL COAL, AND THE RIGHT TO WORK THE SAME WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 31  
QUARTER SOUTH WEST  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

\*ALL COAL, AND THE RIGHT TO WORK THE SAME WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 2 TOWNSHIP 50  
SECTION 31  
QUARTER SOUTH EAST  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

11. FIRST

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 3 TOWNSHIP 50  
SECTION 7  
QUARTER NORTH WEST  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

SECOND

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 3 TOWNSHIP 50  
SECTION 7  
QUARTER NORTH EAST  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

12. FIRST

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 3 TOWNSHIP 50  
SECTION 13  
QUARTER NORTH WEST  
AND THE RIGHT TO WORK THE SAME  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

SECOND

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 3 TOWNSHIP 50  
SECTION 13  
QUARTER NORTH EAST  
AND THE RIGHT TO WORK THE SAME  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

THIRD

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 3 TOWNSHIP 50  
SECTION 13  
QUARTER SOUTH WEST  
AND THE RIGHT TO WORK THE SAME  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

FOURTH

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 3 TOWNSHIP 50  
SECTION 13  
QUARTER SOUTH EAST  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

13. FIRST

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 3 TOWNSHIP 50  
SECTION 15  
LEGAL SUBDIVISIONS 11 AND 12,  
THE SOUTH HALF OF LEGAL SUBDIVISION 13,  
THE EAST HALF AND SOUTH WEST QUARTER OF LEGAL SUBDIVISION 14  
CONTAINING 52.6 HECTARES (130 ACRES) MORE OR LESS

SECOND

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 3 TOWNSHIP 50  
SECTION 15  
QUARTER NORTH EAST  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

THIRD

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 3 TOWNSHIP 50  
SECTION 15  
QUARTER SOUTH WEST  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

FOURTH

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 3 TOWNSHIP 50  
SECTION 15  
QUARTER SOUTH EAST  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

14. FIRST

\*ALL COAL WITHIN, UPON OR UNDER:

LEGAL SUBDIVISIONS ONE (1) AND TWO (2) AND THE SOUTH HALF OF  
LEGAL SUBDIVISIONS SEVEN (7) AND EIGHT (8)  
ALL OF SECTION SEVENTEEN (17)  
TOWNSHIP FIFTY (50)  
RANGE THREE (3)  
WEST OF THE FIFTH MERIDIAN, CONTAINING 48.6 HECTARES  
(120 ACRES) MORE OR LESS  
AND THE RIGHT TO WORK THE SAME

SECOND

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 3 TOWNSHIP 50  
SECTION 17  
LEGAL SUBDIVISION 3 AND 4 AND THE SOUTH HALVES OF LEGAL SUBDIVISIONS 5  
AND 6, CONTAINING 48.6 HECTARES (120 ACRES) MORE OR LESS.

15. FIRST

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 3 TOWNSHIP 50  
SECTION 23  
QUARTER NORTH WEST  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

SECOND

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 3 TOWNSHIP 50  
SECTION 23  
QUARTER NORTH EAST  
AND THE RIGHT TO WORK THE SAME  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

THIRD

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 3 TOWNSHIP 50  
SECTION 23  
QUARTER SOUTH WEST  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

FOURTH

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 3 TOWNSHIP 50  
SECTION 23  
QUARTER SOUTH EAST  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

16. FIRST

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 3 TOWNSHIP 50  
SECTION 25  
QUARTER NORTH WEST  
AND THE RIGHT TO WORK THE SAME  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

SECOND

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 3 TOWNSHIP 50  
SECTION 25  
QUARTER NORTH EAST  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

THIRD

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 3 TOWNSHIP 50  
SECTION 25  
QUARTER SOUTH WEST  
AND THE RIGHT TO WORK THE SAME  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

FOURTH

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 3 TOWNSHIP 50  
SECTION 25  
QUARTER SOUTH EAST  
AREA: 64.7 HECTARES (160 ACRES) MORE OR LESS

17. FIRST

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 3 TOWNSHIP 50  
SECTION 27  
THE EAST HALF OF LEGAL SUBDIVISION 11 AND THE SOUTH EAST QUARTER OF  
LEGAL SUBDIVISION 14  
CONTAINING 12.1 HECTARES (29.81 ACRES) MORE OR LESS

SECOND

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 3 TOWNSHIP 50  
SECTION 27  
LEGAL SUBDIVISION 9 AND 10 AND THE  
SOUTH HALVES OF LEGAL SUBDIVISIONS 15 AND 16  
CONTAINING 48.3 HECTARES (119.25 ACRES) MORE OR LESS

THIRD

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 3 TOWNSHIP 50  
SECTION 27  
THE EAST HALVES OF LEGAL SUBDIVISIONS 3 AND 6  
CONTAINING 16.1 HECTARES (39.75 ACRES) MORE OR LESS

FOURTH

\*ALL COAL WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 3 TOWNSHIP 50  
SECTION 27  
QUARTER SOUTH EAST  
AREA: 64.3 HECTARES (159 ACRES) MORE OR LESS

18. \*ALL COAL AND THE RIGHT TO WORK THE SAME WITHIN, UPON OR UNDER:  
MERIDIAN 5 RANGE 3 TOWNSHIP 50  
SECTION 35  
THE EAST HALF OF SAID SECTION AND LEGAL SUBDIVISIONS 3, 6, 11 AND 14  
AND THE EAST HALVES OF LEGAL SUBDIVISIONS 4, 5, 12 AND 13  
AS SHOWN ON A PLAN OF SURVEY OF THE SAID TOWNSHIP  
DATED 13 AUGUST 1886  
CONTAINING 561.75 ACRES MORE OR LESS