Certain Tax Considerations of the Arrangement

The following summary is intended to provide information that may be of assistance to DeeThree Shareholders who participated (and did not exercise dissent rights) in the May 15, 2015 Arrangement. Please refer to the section on “Certain Canadian Federal Income Tax Considerations” and “Certain U.S. Federal Income Tax Considerations to U.S. Holders” in the Information Circular on the Arrangement dated April 9, 2015, for further information. All the limitations and assumptions in those sections of the Information Circular apply for purposes of this summary. Please refer to the Information Circular for the meaning of capitalized terms that are not otherwise defined below. This summary provides general information only. DeeThree Shareholders are urged to consult their tax advisors concerning the tax consequences of the Arrangement to them.

As described in the Information Circular, under the Plan of Arrangement, each DeeThree Shareholder received 0.3333 of one common share (a “Granite Share”) of Granite Oil Corp. (“Granite”) and 0.5 of one common share (a “Boulder Share”) of Boulder Energy Ltd. Shares (“Boulder”) in exchange for each DeeThree Common Share held prior to the Arrangement.

On the exchange of DeeThree Common Shares for Granite Shares and Boulder Shares, each DeeThree Shareholder was deemed for Canadian tax purposes to have disposed of DeeThree Common Shares for proceeds of disposition equal to the adjusted cost base of such shares at the time of the exchange. The aggregate adjusted cost base of the DeeThree Common Shares held by a Shareholder at the time of the exchange is allocated between the Granite Shares and the Boulder Shares received on this exchange. This allocation is in proportion to the relative estimated fair market value of such shares at the time of the exchange.

DeeThree’s estimate of the allocation of a DeeThree Shareholder’s adjusted cost base in DeeThree Common Shares between the Granite Shares and Boulder Shares at the time of exchange is as set out below:

Granite Shares	35%
Boulder Shares	65%

This estimate of the allocation was determined based on the estimated fair market value of the Spin-Out assets acquired by Boulder from DeeThree pursuant to the Arrangement.

Certain Canadian Tax Reporting

For purposes of the *Income Tax Act* (Canada), an appropriate allocation of the adjusted cost base to a holder of their DeeThree Shares held immediately prior to completion of the Arrangement is: 35% to the Granite Shares received by the holder pursuant to the Arrangement and 65% to the Boulder Shares received by the holder pursuant to the Arrangement.

As an example, if the adjusted cost base of a pre-Arrangement DeeThree Common Share was $10, the adjusted cost base of a Granite Share would be $3.50 and the adjusted cost base of a Boulder Share would be $6.50.

This allocation and estimate of fair market value is not binding on the CRA or any particular DeeThree Shareholder. However, it is recommended that the allocations made by DeeThree Shareholders for Canadian tax purposes be consistent with that estimated by DeeThree.

Neither Granite or Boulder has the information to determine your adjusted cost base in the DeeThree Common Shares. You must determine your adjusted cost using your records. If you require assistance please contact your tax advisor.