

**FILED / PRODUIT**

CT-2015-003

June 30, 2015

Guillaume Phaneuf for / pour  
REGISTRAR / REGISTRAIRE

**CT-2015-003**

OTTAWA, ONT.

# 55

**THE COMPETITION TRIBUNAL**

**IN THE MATTER OF** the *Competition Act*, R.S.C. 1985, c. C-34, as amended;

**AND IN THE MATTER OF** the proposed acquisition by Parkland Industries Ltd., a wholly-owned subsidiary of Parkland Fuel Corporation, of substantially all of the assets of Pioneer Petroleum Holding Limited Partnership, Pioneer Energy LP, Pioneer Petroleum Transport Inc., Pioneer Energy Inc., Pioneer Fuels Inc., Pioneer Petroleum Holding Inc., Pioneer Energy Management Inc., 668086 N.B. Limited, 3269344 Nova Scotia Limited and 1796745 Ontario Ltd.; and

**AND IN THE MATTER OF** an Application by the Commissioner of Competition for one or more orders pursuant to section 92 of the *Competition Act*.

**B E T W E E N:**

**COMMISSIONER OF COMPETITION**

**Applicant**

- and -

**PARKLAND INDUSTRIES LTD., PARKLAND FUEL CORPORATION, PIONEER PETROLEUMS HOLDING LIMITED PARTNERSHIP, PIONEER ENERGY LP, PIONEER PETROLEUMS TRANSPORT INC., PIONEER ENERGY INC., PIONEER FUELS INC., PIONEER PETROLEUMS HOLDING INC., PIONEER ENERGY MANAGEMENT INC., 668086 N.B. LIMITED, 3269344 NOVA SCOTIA LIMITED AND 1796745 ONTARIO LTD.**

**Respondents**

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**REPLY OF THE COMMISSIONER OF COMPETITION TO THE RESPONSE OF PIONEER PETROLEUMS HOLDING LIMITED PARTNERSHIP, PIONEER ENERGY LP, PIONEER PETROLEUMS TRANSPORT INC., PIONEER ENERGY INC., PIONEER FUELS INC., PIONEER PETROLEUMS HOLDING INC., PIONEER ENERGY MANAGEMENT INC., 668086 N.B. LIMITED, 3269344 NOVA SCOTIA LIMITED AND 1796745 ONTARIO LTD.**

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**Department of Justice Canada  
Competition Bureau Legal Services  
50 Victoria Street, Gatineau QC K1A 0C9**

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**Counsel to the Commissioner of Competition**

1. The Commissioner of Competition repeats and relies upon the allegations in his Notice of Application, Statement of Grounds and Material Facts and Concise Statement of Economic Theory (the “Application”), and his Reply to Parkland’s Response (the “Reply to Parkland”) and, except as expressly admitted in the Reply to Parkland, denies the allegations in the Response filed by Pioneer.

**ALL OF WHICH IS RESPECTFULLY SUBMITTED** this 29th day of June, 2015.

**JOHN PECMAN**

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**John Pecman**  
Commissioner of Competition  
Competition Bureau  
Place du Portage, Phase I  
50 Victoria Street  
Gatineau, Quebec  
K1A 0C9

**THE COMPETITION TRIBUNAL**

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**IN THE MATTER OF** the proposed acquisition by Parkland Industries Ltd. of substantially all the assets of Pioneer Petroleum Holding Limited Partnership, Pioneer Energy LP, Pioneer Petroleum Transport Inc., Pioneer Energy Inc., Pioneer Fuels Inc., Pioneer Petroleum Holding Inc., Pioneer Energy Management Inc., 668086 N.B. Limited, 3269344 Nova Scotia Limited and 1796745 Ontario Ltd.; and

**AND IN THE MATTER OF** an Application by the Commissioner of Competition for one or more orders pursuant to 92 of the *Competition Act*.

**BETWEEN:**

**COMMISSIONER OF COMPETITION**

**Applicant**

**- and -**

**PARKLAND INDUSTRIES LTD., PARKLAND FUEL CORPORATION, PIONEER PETROLEUMS HOLDING LIMITED PARTNERSHIP, PIONEER ENERGY LP, PIONEER PETROLEUMS TRANSPORT INC., PIONEER ENERGY INC., PIONEER FUELS INC., PIONEER PETROLEUMS HOLDING INC., PIONEER ENERGY MANAGEMENT INC., 668086 N.B. LIMITED, 3269344 NOVA SCOTIA LIMITED AND 1796745 ONTARIO LTD.**

**Respondents**

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