

COMPETITION TRIBUNAL

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

AND IN THE MATTER OF an Application by the Commissioner of Competition for an order pursuant to section 92 of the *Competition Act*;

AND IN THE MATTER OF the acquisition by CCS Corporation of Complete Environmental Inc.

BETWEEN:

COMMISSIONER OF COMPETITION

APPLICANT

AND

**CCS CORPORATION, COMPLETE ENVIRONMENTAL INC.,
BABKIRK LAND SERVICES INC., KAREN LOUISE BAKER, RONALD
JOHN BAKER, KENNETH SCOTT WATSON, RANDY JOHN WOLSEY,
AND THOMAS CRAIG WOLSEY**

RESPONDENTS

COMPETITION TRIBUNAL TRIBUNAL DE LA CONCURRENCE FILED / PRODUIT CT-2011-002 October 31, 2011 Jos LaRose for / pour REGISTRAR / REGISTRAIRE	
OTTAWA, ONT	# 111

AFFIDAVIT OF SUSAN KOEHL

I, Susan Koehl, of 2800 - 666 Burrard Street, Vancouver, BC, SWEAR THAT:

- I am a legal secretary employed by the law firm of Davis LLP, counsel for the Respondents Karen Louise Baker, Ronald John Baker, Kenneth Scott Watson, Randy John Wolsey and Thomas Craig Wolsey (the "Vendor Respondents") in this action, and as such have personal knowledge of the matters hereinafter deposed to except where stated to be made upon information or belief, and where so stated I believe them to be true..

2. Attached and marked as **Exhibit "A"** to this Affidavit is a copy of a letter dated December 22, 2010 from the Competition Bureau to Torys LLP. I am informed by Morgan Burris, counsel for the Vendor Respondents, and verily believe, that this document was produced by the Commission of Competition in this action and referred to during the examination for discovery of the Commissioner's representative, Trevor MacKay, by counsel for the Vendor Respondents.

3. Attached and marked collectively as **Exhibit "B"** to this Affidavit are copies of pages 287, 289, 290, 300, 301 and 303 from Volume II of the transcript of the examination for discovery of Trevor MacKay.

4. Attached and marked as **Exhibit "C"** to this Affidavit are copies of pages 417, 418, 426, 427 and 428 from Volume III of the transcript of the examination for discovery of Trevor MacKay.

5. Attached and marked as **Exhibit "D"** to this Affidavit are excerpts from the Witness Statement of Rene Amirault, specifically paragraphs 1, 10 through 20.

SWORN BEFORE ME at Vancouver,)
 British Columbia, on October 28, 2011.)
 _____)
 A Commissioner for taking Affidavits)
 for British Columbia.)

_____)
 SUSAN KOEHL)

J. KEVIN WRIGHT
Barrister and Solicitor
DAVIS LLP
2800 - 666 Burrard Street
Vancouver, B.C. V6C 2Z7
604.687.9444

EXHIBIT "A" REDACTED

Examination No. 11-0617.1B

Court File No. CT-2011-02

VOLUME II

THE COMPETITION BUREAU

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

IN THE MATTER OF an Application by the Commissioner of
Competition for an Order pursuant to section 92 of the
Competition Act;

AND IN THE MATTER OF the acquisition by CCS Corporation of
Complete Environmental Inc.

B E T W E E N:

COMMISSIONER OF COMPETITION

APPLICANT

- and -

CCS CORPORATION, COMPLETE ENVIRONMENTAL INC., BABKIRK LAND
SERVICES INC., KAREN LOUISE BAKER, RONALD JOHN BAKER, KENNETH
SCOTT WATSON, RANDY JOHN WOLSEY, AND THOMAS CRAIG WOLSEY
RESPONDENTS

CONTINUED EXAMINATION FOR DISCOVERY OF TREVOR MACKAY,
pursuant to an appointment made on consent of the parties
to be reported by Cornell•Catana Reporting Services, on
July 5th, 2011, commencing at the hour of 10:08 in the
forenoon.

APPEARANCES:

Nikiforos Iatrou	for the Applicant
Jonathan Hood	for the Applicant
Alexa Gendron-O'Donnell	for the Applicant
Linda M. Plumpton	for the Respondents, CCS, Babkirk and Complete
Crawford Smith	for the Respondents, CCS, Babkirk and Complete
J. Kevin Wright	for the Respondents, shareholders
Morgan Burris	for the Respondents, shareholders

This Examination was taken down by sound recording

This is Exhibit "B" referred to in the
Affidavit of.....SUSAN KOEHL.....
sworn before me at Vancouver, B.C.
This.....28.....day of.....OCTOBER.....20 11.....

J. Allan King
.....
A Commissioner for taking Affidavits
for British Columbia

1 is that there was existing waste on the Babkirk site and
2 they had specifically -- they had gotten Ken Watson to
3 undertake certain efforts to I believe treat that waste.

4 733. Q. Okay. Is that the event in October of 2009
5 that Mr. Iatrou was referring to?

6 MR. IATROU: I'm sorry, can you repeat the
7 question?

8 BY MR. WRIGHT:

9 734. Q. Is that the event in October 2009 that Mr.
10 Iatrou was referring to?

11 A. I believe so. I don't recall the date that
12 that was.

13 735. Q. Okay. Apart from that activity, however we
14 characterize it, are you aware that Complete as distinct
15 from Babkirk Landfill Services Limited was engaged in
16 other businesses leading up to the time of the closing on
17 January 7th, 2011?

18 A. Yes.

19 736. Q. What's your information about that?

20 A. I can give you my understanding of what the
21 business activities were. They related to contracts they
22 had to -- for a roll-off rental business and additionally
23 for the operation of a transfer station.

24 737. Q. Anything else?

25 MR. IATROU: Can we maybe try to put it this way?

1 Environmental Inc., as of the time of closing, January 7,
2 2011, are accurately summarized or reflected in those
3 definitions?

4 A. I believe so, yes.

5 741. Q. My information is that for a matter of years
6 leading up to the closing on January 7, 2011 that Babkirk
7 Land Services Limited had had no customers and no
8 revenues. Is that consistent with the Bureau's
9 information?

10 MR. IATROU: Sorry, for how many years prior?

11 MR. WRIGHT: I'll say three years. At least
12 three.

13 THE WITNESS: That's my understanding.

14 BY MR. WRIGHT:

15 742. Q. It had no customers during those three years?

16 A. They accepted waste prior to that and I don't
17 know if they would consider those to be ongoing
18 customers, but if not, they didn't have any new waste
19 product to ---

20 743. Q. My information is that the last time that
21 Babkirk Land Services Ltd. accepted material or waste at
22 its facility was in 2004. Does the Bureau have any
23 information to the contrary?

24 A. No. I believe that's correct.

25 744. Q. Now, with respect to the Complete businesses,

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I take it that you'll accept that the Complete assets and the businesses of Complete as distinct from Babkirk Land Services Ltd. were not used by Complete in the operation of a Secure landfill prior to the January 7th, 2011 closing, correct?

A. Correct.

745. Q. And you would also agree that the services that were being provided by Complete prior to the January 7th, 2011 closing were not substitutes for Secure Landfill Services, correct?

A. I believe that's correct, yes.

746. Q. Now, I understand from the Notice of Application and the Reply that the Commissioner's allegation is that competition has been or will likely be prevented substantially because CCS has acquired control over Babkirk Land Services Ltd., in particular the Babkirk facility owned by that company, the Secure landfill permit and related regulatory approvals owned by Babkirk Land Services Ltd. Is that correct?

A. Sorry, could you repeat that?

747. Q. Okay. I'll try again. I'm probably not going to do this verbatim. My understanding of the Commissioner's allegations, which I draw from the Pleadings, the Notice of Application, the Reply of the Commissioner -- my question, by the way, is going to be

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MR. IATROU: There were some drafts that went back and forth with ---

MR. SMITH: If I can make ---

MR. IATROU: Yes, and ---

MR. SMITH: If I can just make a suggestion ---

MR. IATROU: Yes?

MR. SMITH: --- you might want to look at MCDM 0007_00000096, because the draft of the document that you were -- the document you referred to is a draft.

MR. IATROU: Yes.

MR. SMITH: The document at MCDM etc. is signed by a representative of CCS.

MR. IATROU: Thanks for that clarification, Mr. Smith.

(OFF RECORD DISCUSSION)

MR. IATROU: The document that Mr. Smith has pointed out, MCDM 0007_96, is the undertaking that we are referring to at paragraph 7.

MR. WRIGHT: Okay. And the Bureau negotiated that with the advice and assistance of counsel, correct?

MR. IATROU: I mean, it was from Bill Miller, who is counsel at the Bureau.

MR. WRIGHT: Right. And the Bureau was completely satisfied with the form of the undertaking described in this letter?

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2 MR. IATROU: The answer is yes.

3 MR. WRIGHT: The Bureau did not seek or obtain
4 any undertaking or commitments from CCS with respect to
5 the businesses of Complete Environmental Inc. that we've
6 discussed? Instead the undertakings were only directed
7 to the interests and assets of Babkirk Land Services
8 Ltd.?

9 MR. IATROU: That's correct.

10 MR. WRIGHT: It's noted in the letter,
11 "Although the Commissioner had come to
12 the view that she would challenge the
13 transaction, she deliberately chose not
14 to pursue an interim injunction."

15 Correct?

16 MR. IATROU: Correct.

17 MR. WRIGHT: Does the Commissioner have any
18 information that CCS has violated the undertaking given
19 by this letter?

20 MR. IATROU: No.

21 MR. WRIGHT: Okay. I'm just going to turn for a
22 moment to the relief sought in the case. One of the
23 items of relief sought by the Commissioner in the Notice
24 of Application is dissolution of what's defined as the
25 merger. And I want to make sure I have an understanding
of what the Bureau says ought to happen, what Order the

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MR. WRIGHT: Is there a reason why the Commissioner has identified dissolution as the first preferred remedy and only seeks divestiture in the alternative?

MR. IATROU: It's listed first, and the other options that we're raising for the tribunal to consider are in the same paragraph, identified as alternatives that the tribunal may consider. Beyond that, no.

MR. WRIGHT: With respect to the relief sought of dissolution, the Bureau understands that by seeking dissolution it's seeking to return to the control of the vendor Respondents to the extent it may be possible businesses of Complete which we've established do not give rise to competitive concerns of either the Commissioner or this Application?

MR. IATROU: We've given you a -- we've taken under advisement one of the questions you've built into your question there. In terms of what dissolution would entail, that it would entail the reacquisition by the vendors of the shares that comprise all of the businesses, I agree with you.

MR. WRIGHT: Now, I'll just turn to another topic. In the course of the Examination conducted by lawyers for CCS yesterday and this morning and early afternoon today, a number of times the responses that

Examination No. 11-0617.1C

Court File No. CT-2011-02

VOLUME III

THE COMPETITION TRIBUNAL

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

IN THE MATTER OF an Application by the Commissioner of Competition for an Order pursuant to section 94 of the Competition Act;

AND IN THE MATTER OF the acquisition by CCS Corporation of Complete Environmental Inc.

B E T W E E N:

COMMISSIONER OF COMPETITION

APPLICANT

- and -

CCS CORPORATION, COMPLETE ENVIRONMENTAL INC., BABKIRK LAND SERVICES INC., KAREN LOUISE BAKER, RONALD JOHN BAKER, KENNETH SCOTT WATSON, RANDY JOHN WOLSEY, AND THOMAS CRAIG WOLSEY

RESPONDENTS

EXAMINATION FOR DISCOVERY OF TREVOR MACKAY, pursuant to an appointment made on consent of the parties to be reported by Cornell•Catana Reporting Services, on July 6, 2011, commencing at the hour of 10:00 in the forenoon.

APPEARANCES:

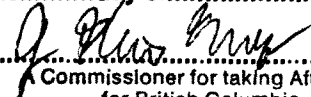
Mr. Nikiforos Iatrou for the Applicant
Mr. Jonathan Hood for the Applicant
Ms Alexa Gendron-O'Donnell for the Applicant

Ms Linda M. Plumpton for Respondents CCS, Complete and Babkirk
Mr. Crawford Smith for Respondents CCS, Complete and Babkirk

Mr. J. Kevin Wright for the shareholder Respondents
Ms Morgan Burris for the shareholder Respondents

This Examination was taken down by sound recording by Cornell•Catana Reporting Services Ltd.

This is Exhibit "C" referred to in the Affidavit of SUSAN ROEHL sworn before me at Vancouver, B.C. This ²⁶ day of OCTOBER, 2011


A Commissioner for taking Affidavits for British Columbia

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MR. IATROU: To the extent that we have those documents and they form part of the summary, that's the case.

MR. WRIGHT: To be clear, if it was an e-mail generated response to a request from the Bureau or a written response to a request for information?

MR. IATROU: Again, we would have used -- that would have formed part of ---

MR. WRIGHT: Did the Bureau obtain any Section 11 orders as part of its investigation?

MR. IATROU: We're going to take that under advisement.

MR. WRIGHT: Obviously, if there were I'd like particulars of that?

MR. IATROU: We'll take that under advisement as well.

BY MR. WRIGHT:

1027. Q. I just wanted to turn to paragraph 31(a) of the application. This is the paragraph for relief sought and the last portion of paragraph 31(a) with respect to the question of divestiture speaks to a purchaser that has been approved in advance by the Commissioner. Do you see that?

A. Yes.

1028. Q. I take it you would agree with me that where

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1 the Commissioner seeks divestiture, as a matter of
2 policy, the Commissioner will seek to have the term of
3 either the consent agreement or order require that the
4 purchaser be approved by the Commissioner?

5 A. Yes.

6 1029. Q. In fact, that's been the case in all merger
7 cases under Section 92 since the merger provision,
8 Section 92, came into effect in 1986.

9 That is whether it's a consent agreement or a
10 contested case, where divestiture has been sought and
11 where it is being agreed to ordered, that there has been
12 a term that requires approval of the purchaser by the
13 Bureau?

14 A. I don't know the answer to that.

15 1030. Q. You're not aware of any examples where that
16 hasn't happened?

17 A. I'm not.

18 1031. Q. It's important to the Bureau that they have
19 an opportunity to approve the purchaser in the case of a
20 divestiture; correct?

21 A. That's correct.

22 1032. Q. Why is it important?

23 A. To maintain competition.

24 1033. Q. In particular, would it be fair to say that
25 it's important from the Bureau's perspective, that the

1 Do you have that?

2 A. Yes.

3 1047. Q. I take it that if there is a dissolution as
4 opposed to a divestiture in this case, the Bureau would
5 not have the opportunity to conduct or approve the
6 operator of that assignment; correct?

7 A. I believe that's correct, yes.

8 1048. Q. Is there any way in which there is an
9 advantage in terms of achieving an effective remedy to
10 require a dissolution as opposed to divestiture?

11 MR. IATROU: As we've previously stated, the
12 remedy that we've sought just simply has been framed in
13 such a way as to allow the Tribunal to identify the most
14 appropriate remedy. Beyond that, I don't think we have
15 more information.

16 MR. WRIGHT: Thank you, I'll take that answer.
17 I'm going to ask something further though, is that in
18 order to assist the Tribunal -- or assist my clients in
19 understanding the case to mean, does the Bureau have any
20 reason to believe that divestiture would not be effective
21 and ordered in a remedy in this case?

22 MR. IATROU: Divestiture were ordered and the
23 divestiture were effected?

24 MR. WRIGHT: Yes?

25 MR. IATROU: The divestiture would succeed. If

1 the divestiture were to work then I think you're correct.

2 MR. WRIGHT: If it were to be effected.

3 MR. IATROU: If it were to be effective at
4 removing the SPC ---

5 MR. WRIGHT: Let me back up here. The
6 divestiture order is made in the ordinary course?

7 MR. IATROU: Yes?

8 MR. WRIGHT: There's no guarantees -- let me back
9 up.

10 MR. IATROU: Sure, I understand where ---

11 MR. WRIGHT: As far as the Tribunal is concerned,
12 it orders the divestiture. What happens once the
13 divestiture is completed is what happens?

14 MR. IATROU: I agree with you. It's with a view
15 to resolving the ---

16 MR. WRIGHT: So the Tribunal is going to have to
17 -- obviously, there's no concession to this point, but
18 assuming that the Commissioner -- and to show there was
19 or likely to be a substantial prevention of competition,
20 the Tribunal is charged to decide whether or what remedy
21 to issue and that's where the Bureau has said one of them
22 may be divestiture.

23 And so if the Bureau were to order divestiture,
24 in that case once it's divested, that's it. The order is
25 spent and subject to any restraints on what would happen

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-- the divestiture in terms of reselling to CCS, for example.

So what I'm getting at is this: Does the Bureau have any information or any reason to believe that if the Tribunal were to make an order for divestiture, that it would not lead to an actual divestiture?

MR. IATROU: If the Tribunal saw it fit to order divestiture, it would place the appropriate safeguards in place so that the Tribunal was satisfied the divestiture would be effected, then I think that would be the case.

MR. WRIGHT: And to take that one step further. If the Tribunal had to choose between dissolution and divestiture, there are no advantages or in terms of the effectiveness of the likely remedy, in ordering dissolution over divestiture?

MR. IATROU: I don't know that we can answer that.

MR. WRIGHT: You don't have information?

MR. IATROU: No.

MR. WRIGHT: As a matter of policy, does the Bureau always seek all possible remedies under Section 92 in bringing applications? That is all possible remedies of the Tribunal -- an order under Section 92 in a contested application?

MR. IATROU: As you know, applications are rare

COMPETITION TRIBUNAL

BETWEEN:

THE COMMISSIONER OF COMPETITION

Applicant

- and -

CCS CORPORATION, COMPLETE ENVIRONMENTAL INC., BABKIRK LAND SERVICES INC., KAREN LOUISE BAKER, RONALD JOHN BAKER, KENNETH SCOTT WATSON, RANDY JOHN WOLSEY, AND THOMAS CRAIG WOLSEY

Respondents

WITNESS STATEMENT OF RENE AMIRAULT

I, Rene Amirault, of the City of Calgary, in the Province of Alberta, AFFIRM as follows:

1. I am the President & CEO of Secure Energy Services Inc. ("SES"). SES is an energy services corporation that provides specialized services to upstream oil and gas companies operating in the Western Canadian Sedimentary Basin. These services include, among others, landfill disposal of by-products associated with oil and gas development and production. I have worked at SES, and have been its President and CEO, since March 2007 and, as such, am familiar with its operations as related to the topics I discuss below. Where I rely on information provided to me by others, I identify the individual, and verily believe the information to be true.

This is Exhibit "D" referred to in the Affidavit of.....SUSAN KOEHL..... sworn before me at Vancouver, B.C. This 28 day of OCTOBER 20 11.....
A Commissioner for taking Affidavits for British Columbia

III: SES's Attempt to Purchase the Babkirk Facility

10. In the Spring of 2010, Dan Steinke (“**Steinke**”), SES’s Vice-President Business Development, initiated discussions with one of the Vendor Respondents, Randy Wolsey (“**Wolsey**”). The discussions were about SES acquiring the Babkirk facility and I am advised by Steinke that he spoke with Wolsey on a few occasions about such an acquisition. SES wanted to acquire the Babkirk facility because SES was interested in expanding the scope of its operations in B.C. so as to provide Secure Landfill disposal services.

11. SES currently has two facilities in B.C.: the Dawson Rolla facility and the Kotcho facility. However, both facilities are for the disposal of waste water and liquid oilfield waste; neither is a Secure Landfill. SES understood that the Vendor Respondents had obtained an Environmental Assessment (“**EA**”) certificate from the B.C. Environmental Assessment Office (“**EAO**”) and a Permit to Discharge from the B.C. Ministry of the Environment (“**MOE**”). As such, SES understood that the Babkirk facility was authorized to ultimately be operated as a Secure Landfill.

12. On June 29, 2010, Steinke, Corey Higham (“**Higham**”) (SES’s Business Development Representative) and I met with Wolsey, Thomas Craig Wolsey, Ronald John Baker (“**Baker**”) and

Karen Louise Baker, at Baker's office, to discuss the possibility of SES purchasing the Babkirk facility. At this meeting, we provided the Vendor Respondents with information on SES and we, in turn, were provided with information about the existing Babkirk facility. We then accompanied the Vendor Respondents to the Babkirk facility where they provided us with a tour. A copy of the presentation we used is attached to my witness statement as Exhibit D.

13. After the meeting, SES continued to be interested in purchasing the Babkirk facility. As part of its due diligence, SES sought answers to questions that the Vendor Respondents could not answer during the June 29, 2010 meeting. Many of these regarded modifications to the regulatory permits that SES would need if it decided to expand the size of the landfill or change its design. SES needed this information so as to determine what it would be prepared to pay for the Babkirk facility.

14. SES asked for permission to contact the regulators to get answers to these questions, but the Vendor Respondents wanted to contact the regulators themselves. As a result, Higham drafted an e-mail with the questions SES wanted answered. This was emailed to Baker on July 6, 2010. I am informed by Higham that the copy attached to my witness statement as Exhibit E is a copy of this e-mail.

15. I was informed by Higham that he called Baker on July 28, 2010, to see if he had an opportunity to speak with the regulators. Higham had waited a few weeks before following up with Baker because he was aware that the government contact, Del Reinheimer with the MOE, had been on vacation and was not returning until late July. Higham informed me that during this call, Baker advised him that SES's questions had not been sent to the regulators. Instead, the Vendor Respondents had signed a letter of intent with CCS Corporation ("CCS") with respect to the sale of the Babkirk facility. Prior to this time SES was not aware that the Vendor Respondents were also in negotiations with CCS.

16. On August 27, 2010, SES learned from Wolsey that CCS had completed its due diligence on the Babkirk facility and was going to proceed with the purchase. As a result, SES was unable to acquire the Babkirk facility.

17. SES's intention, if it had purchased the Babkirk facility, was to construct and operate the Babkirk facility as a Secure Landfill and the Vendor Respondents were aware of that. The Babkirk facility was an attractive asset because it had already received an EA Certificate and a Permit to Discharge. As is described in more detail below, SES's experience trying to obtain regulatory approval for its proposed Secure Landfill at its Heritage site is that the process can be long, uncertain, and costly. Even after spending significant time and money, a party seeking to construct a Secure Landfill in B.C. has no guarantee of overcoming the regulatory hurdles.

18. The Vendor Respondents' receipt of these approvals for the Babkirk facility, therefore, made that facility a very attractive asset for SES.

19. Had SES acquired the Babkirk facility in August 2010, SES would have commenced construction immediately and would have been servicing customers in 2010, upon receipt of any regulatory approval amendments, which would not have been major. If the acquisition was completed later, construction would have started in the spring of 2011 (due to the winter season) and the facility would have been operational by August 2011, upon receipt of any regulatory approval amendments, which would not have been major. Thus, if SES had acquired the Babkirk facility rather than CCS, there would have, by now, been competition in the market.

20. The Babkirk facility was also attractive due to its location. It is not far from the Alaska highway, and is surrounded by lands in need of clean-up. Currently, operators seeking to dispose of Hazardous Waste in that area typically take their waste to CCS' Silverberry facility, as it is the only one in the area. SES's goal would have been to compete with CCS for those customers, similar to the way that SES competes with CCS for customers in Alberta.

No. CT-2011-002

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BETWEEN:

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ENVIRONMENTAL INC., BABKIRK LAND
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RONALD JOHN BAKER, KENNETH SCOTT
WATSON, RANDY JOHN WOLSEY, AND THOMAS
CRAIG WOLSEY**

RESPONDENTS

AFFIDAVIT OF SUSAN KOEHL

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File No. 81482-00001

MLB/sk