

**Report of Organizational Actions
 Affecting Basis of Securities**

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name		2 Issuer's employer identification number (EIN)	
Tamarack Valley Energy Ltd.		85964 5319	
3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact	
Ron Hozjan, Chief Financial Officer	403 263-4440	info@tamarackvalley.ca	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact		7 City, town, or post office, state, and Zip code of contact	
Fifth Avenue Place – East Tower, 600, 425 – 1st Street S.W.		Calgary, Alberta, T2P 3L8	
8 Date of action		9 Classification and description	
January 11, 2017		Tamarack Valley Energy Ltd. common shares	
10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)
87505Y409		TVE (TSX)	

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ On January 11, 2017, Tamarack Valley Energy Ltd. (Tamarack) and Spur Resources Ltd. ("Spur") entered into an arrangement pursuant to which Tamarack acquired all of the issued and outstanding shares of Spur. Spur shareholders received for each Spur share: (i) at such Spur shareholder's election: (A) 1.6896 Tamarack shares; (B) \$6.08 in cash; or (C) some combination of cash and Tamarack shares; (ii) 0.3333 of a share in a new corporation that holds certain former Spur assets ("New Spur"); and (iii) 0.20 of a New Spur warrant. Tamarack also assumed Spur's net debt.

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ▶ The Tamarack and New Spur shares and New Spur warrants will generally have a tax basis equal to their fair market value on the date they were received. If any part of the arrangement constitutes a nonrecognition transaction for US federal income tax purposes, the property received in the non-recognition transaction will generally have a tax basis equal to the securityholder's tax basis in the property exchanged.

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶ The fair market value of Tamarack shares is based upon the trading prices of such shares on January 11, 2017.

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ 354, 358, 367, 1001, 1221.

18 Can any resulting loss be recognized? ▶ Generally, yes, except to the extent the arrangement involved a nonrecognition exchange.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ _____

Any gain recognized should be reported by securityholders for their tax year that includes January 11, 2017.

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here

Signature ▶  Date ▶ Feb 22/17
Print your name ▶ Ron Hozjan Title ▶ Chief Financial Officer

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶				Firm's EIN ▶
	Firm's address ▶				Phone no.