

Taxation information with respect to the trust conversion to a corporation

On November 1, 2009, True Energy Trust (the “Trust”) converted from a trust to a corporation named Bellatrix Exploration Ltd. (“Bellatrix”).

For Canadian income tax purposes the exchange of units of the Trust for shares of Bellatrix was completed on a tax-deferred basis. Therefore, the exchange should not result in a capital gain or loss to any unitholder of the Trust.

For US income tax purposes, the exchange is generally considered a taxable event. Any gain or loss should be considered a capital gain or loss where the units were held as capital assets, and should be a long-term capital gain or loss where the units were held for a period exceeding one year. Long-term capital gains of non-corporate taxpayers are generally taxed at favorable rates and the deductibility of capital losses is subject to limitations.

Exchangeable Shareholders of True Energy Inc. will be deemed not to have disposed of their exchangeable shares and to have acquired the Bellatrix shares received on the exchange at a cost equal to the aggregate adjusted cost base of the exchanged Exchangeable Shares.

This summary is of general nature only and is qualified in its entirety by the more detailed tax disclosure contained in the Information Circular dated September 25, 2009. A copy of the Information Circular pertaining to the conversion may be obtained from the SEDAR website at <http://www.sedar.com/>.

Unitholders should consult with their own tax advisors for advice with respect to the tax considerations and consequences applicable to their particular circumstances.