

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

	§	
	§	
In re	§	Chapter 11
	§	
EXPRESS ENERGY SERVICES	§	
OPERATING, LP, et al.,	§	Case No. 09-38044
	§	
Debtors.	§	
	§	
	§	Jointly Administered

NOTICE OF DEADLINES FOR FILING PROOFS OF CLAIM

TO ALL PERSONS AND ENTITIES WITH CLAIMS AGAINST THE ENTITIES SET FORTH ON EXHIBIT A HERETO (collectively, the “Debtors”):

PLEASE TAKE NOTICE THAT, on November 25, 2009, the United States Bankruptcy Court for the Southern District of Texas (the “Court”), having jurisdiction over the Debtors’ chapter 11 cases entered an order (the “Bar Date Order”) establishing (i) 4:00 p.m. (prevailing Central Time), on December 28, 2009, as the last date and time for each person or entity (including, without limitation, individuals, partnerships, corporations, joint ventures, and trusts) to file a proof of claim (each a “Proof of Claim”) based on prepetition claims against the Debtors (the “General Bar Date”); and (ii) 4:00 p.m. (prevailing Central Time), on April 26, 2010, as the last date and time for governmental units (as defined in section 101(27) of the Bankruptcy Code) to file Proofs of Claim against the Debtors (the “Governmental Bar Date” together with the General Bar Date, the “Bar Dates”).

The Bar Date Order, the Bar Dates and the procedures set forth below for the filing of Proofs of Claim apply to all claims against the Debtors (other than those set forth below as being specifically excluded) that arose prior to October 27, 2009 (the “Commencement Date”), the date on which the Debtors commenced their case under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”).

A CLAIMANT SHOULD CONSULT AN ATTORNEY IF THE CLAIMANT HAS ANY QUESTIONS, INCLUDING WHETHER SUCH CLAIMANT SHOULD FILE A PROOF OF CLAIM.

1. WHO MUST FILE A PROOF OF CLAIM

You **MUST** file a **Proof of Claim** to share in the Debtors’ estates if you have a claim that arose prior to the Commencement Date, and it is not one of the other types of claims described in Section 2 of this notice. Acts or omissions of the Debtors that arose before the Commencement Date may give rise to claims against the Debtors that must be filed by the applicable Bar Date, notwithstanding that such claims may not have matured or become fixed or liquidated or certain prior to the Commencement Date.

Pursuant to section 101(5) of the Bankruptcy Code and as used herein, the word “claim” means: (a) a right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed,

contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured; or (b) a right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured.

2. WHO NEED NOT FILE A PROOF OF CLAIM

You need not file a Proof of Claim if:

- (1) Your claim is listed on the Debtors' Schedules of Assets and Liabilities and/or Schedules of Executory Contracts and Unexpired Leases (collectively, the "**Schedules**") and (i) is **not** described as "disputed," "contingent," or "unliquidated," (ii) you do **not** dispute the amount, priority, or nature of the claim set forth in the Schedules, and (iii) you do **not** dispute that the claim is an obligation of the specific Debtor against which the claim is listed on the Schedules;
- (2) Your claim has been paid in full by the Debtors;
- (3) You hold an interest in the Debtors, which interest is based exclusively upon the ownership of common or preferred stock, membership interests, partnership interests, or warrants or rights to purchase, sell or subscribe to such a security or interest; **provided, however,** that if you wish to assert claims (as opposed to ownership interests) against the Debtors that arise out of or relate to the ownership or purchase of an interest, including claims arising out of or relating to the sale, issuance, or distribution of the interest, then you must file Proofs of Claim on or before the applicable Bar Date, unless another exception identified herein applies;
- (4) You hold a claim allowable under sections 503(b) and 507(a)(2) of the Bankruptcy Code as an administrative expense;
- (5) You hold a claim that has been allowed by an order of this Court entered on or before the applicable Bar Date;
- (6) You hold a claim for which a separate deadline is fixed by this Court (whereupon you will be required to file a Proof of Claim by that separate deadline);
- (7) You are a Debtor in these cases having a claim against another Debtor; or
- (8) You hold a claim for which you have already properly filed a Proof of Claim with the Clerk of the Court or the Debtors' notice and claims agent, The Garden City Group, Inc. ("**GCG**"), against the Debtors utilizing a claim form that substantially conforms to the form enclosed with this notice (the "**Proof of Claim Form**").

If your claim falls within any of the above categories, your rights as the holder of such claim will be preserved without you filing of a Proof of Claim. Any other person or entity (including, without limitation, each individual, partnership, joint venture, corporation, estate, governmental unit or trust) must file a Proof of Claim, as described herein, before the applicable Bar Date.

YOU SHOULD NOT FILE A PROOF OF CLAIM IF YOU DO NOT HAVE A CLAIM AGAINST THE DEBTORS.

THE FACT THAT YOU HAVE RECEIVED THIS NOTICE DOES NOT MEAN THAT YOU HAVE A CLAIM OR THAT THE DEBTORS OR THE COURT BELIEVE THAT YOU HAVE A CLAIM.

3. EXECUTORY CONTRACTS AND UNEXPIRED LEASES

Any person or entity that holds a claim arising from the rejection of an executory contract or unexpired lease must file a Proof of Claim based on such rejection by the later of (i) the applicable Bar Date, and (ii) the date which is 30 days following the entry of an order of the Court rejecting such executory contract or unexpired lease or be forever barred from doing so.

4. WHEN AND WHERE TO FILE

All Proofs of Claim must be filed so as to be **actually received** on or before the applicable Bar Date at the following address:

If by overnight courier or hand delivery to GCG:

EES Bankruptcy Administration
c/o The Garden City Group, Inc.
5151 Blazer Parkway, Suite A
Dublin, Ohio 43017-4818

If by first-class mail, to GCG:

EES Bankruptcy Administration
c/o The Garden City Group, Inc.
P.O. Box 9518
Dublin, Ohio 43017-4818

Or by hand delivery to the Court:

United States Bankruptcy Court
Southern District of Texas
515 Rusk Avenue
Houston, Texas 77002

Proofs of Claim will be deemed timely filed only if **actually received** by GCG or the Court on or before the applicable Bar Date. Proofs of Claim may **not** be delivered by facsimile, telecopy, or electronic mail transmission.

5. WHAT TO FILE

If you file a Proof of Claim, your filed Proof of Claim must: (i) be written in the English language; (ii) be denominated in lawful currency of the United States; (iii) conform substantially with the Proof of Claim Form; (iv) state the Debtor against which it is filed; (v) set forth with specificity the legal and factual basis for the alleged claim; (vi) include supporting documentation or an explanation as to why documentation is not available; and (vii) be signed by the claimant or, if the claimant is not an individual, by an authorized agent of the claimant.

If you are asserting a claim against more than one Debtor, separate Proofs of Claim must be filed against each such Debtor and all holders of claims must identify on their Proof of Claim the specific Debtor against which their claim is asserted and the case number of that Debtor's bankruptcy case. A list of the names of the Debtors and their case numbers is set forth on **Exhibit A**, attached to this notice, as well as at the top of the Proof of Claim Form.

Additional Proof of Claim forms may be obtained free of charge at www.uscourts.gov/bkforms, at www.expressenergyinfo.com, by contacting GCG at (631) 470-5000 (Attn: Patrick Leathem), or by emailing expressenergyinfo@gardencitygroup.com

YOU SHOULD ATTACH TO YOUR COMPLETED PROOF OF CLAIM FORM COPIES OF ANY WRITINGS UPON WHICH YOUR CLAIM IS BASED. DO NOT SEND ORIGINAL DOCUMENTS AS ATTACHMENTS MAY BE DESTROYED AFTER SCANNING. IF THE DOCUMENTS ARE VOLUMINOUS, YOU SHOULD ATTACH A SUMMARY.

6. CONSEQUENCES OF FAILURE TO FILE A PROOF OF CLAIM BY THE APPLICABLE BAR DATE

Except with respect to claims of the type set forth in Section 2 of this notice, any creditor who fails to file a Proof of Claim on or before the applicable Bar Date in the appropriate form for any claim such creditor holds or wishes to assert against the Debtors, will be barred from asserting such claim against the Debtors and their estates, and the holder of such claim shall not be permitted to participate in any distribution in the Debtors' chapter 11 cases on account of such claim.

7. THE DEBTORS' SCHEDULES AND ACCESS THERETO

You may be listed as the holder of a claim against the Debtors in the Schedules. If you rely on the Schedules, it is your responsibility to determine that the claim upon which you rely is accurately listed in the Schedules.

As set forth above, if (i) you agree with the nature, amount, and status of your claim as listed in the Schedules, (ii) you do not dispute that your claim is only against the specified Debtor, and (iii) your claim is not described as "disputed", "contingent", or "unliquidated", then you need not file a Proof of Claim. If you decide, to file a Proof of Claim, you must do so before the applicable Bar Date in accordance with the procedures set forth herein.

Copies of the Schedules and the Bar Date Order may be examined by interested parties on the Court's electronic docket for the Debtors' chapter 11 cases, which is posted on the Internet www.txsb.uscourts.gov (a PACER login and password are required and can be obtained through the PACER Service Center at www.pacer.psc.uscourts.gov) and, free of charge, at www.expressenergyinfo.com. Copies of the Schedules and the Bar Date Order may also be examined by interested parties at the office of the Clerk of the Bankruptcy Court, United States Bankruptcy Court for the Southern District of Texas, 515 Rusk Avenue, Houston, Texas 77002, which is open weekdays between the hours of 8:00 a.m. and 5:00 p.m. (prevailing Central Time). Copies of the Schedules may also be obtained by request to GCG by writing to the address or calling the telephone number set forth below:

EES Bankruptcy Administration
c/o The Garden City Group, Inc.
P.O. Box 9518
Dublin, Ohio 43017-4818
Telephone: (631) 470-5000
Attn: Patrick Leathem

In the event the Debtors amend their Schedules to (i) designate a claim as disputed, contingent, unliquidated, or undetermined, (ii) change the amount of a claim reflected therein, or (iii) add a claim that was not listed on the Schedules, you will be notified if your claim is affected. If your claim is affected,

you must file a Proof of Claim on account of any such claim by the later of (i) the applicable Bar Date or (ii) the date that is thirty (30) days after the Debtors provide notice of such amendment, or be forever barred from doing so.

A holder of a possible claim against the Debtors should consult an attorney regarding any matters not covered by this notice, such as whether the holder should file a Proof of Claim.

DATED: November 25, 2009
Houston, Texas

BY ORDER OF THE COURT

WEIL, GOTSHAL & MANGES LLP
700 Louisiana Street, Suite 1600
Houston, Texas 77002
Telephone: (713) 546-5000
Facsimile: (713) 224-9511
Alfredo R. Pérez

ATTORNEYS FOR DEBTORS AND
DEBTORS IN POSSESSION

EXHIBIT A

Name of Debtor	Case Number	Tax Identification Number
Express Energy Services Operating, LP	09-38044	20-4737644
Express Energy Services (2008) LLC	09-38049	26-3063087
Express Energy Services Holding, LP	09-38050	20-4737122
Express Energy Services GP, LLC	09-38051	20-4737083
Express Energy Services CT, LP	09-38053	20-4948432
Express Energy Services Ark, LP	09-38054	20-5645287
Express Energy Services P&A, LP	09-38055	20-4948402
Express Energy Services WL, LP	09-38057	26-1342834
Express—Byrd R&S GP, LLC	09-38058	20-8487556
Express—Byrd R&S Oilfield Services, L.P.	09-38060	20-8487580
Express—MBCC GP, LLC	09-38061	20-8490760
Express—MBCC, Ltd.	09-38062	20-8490802
Express—Mike Byrd Casing Crews GP, LLC	09-38063	20-8490852
Express—Mike Byrd Casing Crews, Ltd.	09-38064	20-8490938
Express—R&S Tong Services GP, LLC	09-38065	20-8482230
Express—R&S Tong Services, Ltd.	09-38066	20-8487465
Express—BAH Leasing GP, LLC	09-38067	20-8490510
Express—BAH Leasing, Ltd.	09-38068	20-8490708
D&D Tongs GP, LLC	09-38069	20-8496566
D&D Tongs, L.P.	09-38070	20-8496586
Express—North Trail Oilfield Services, GP, LLC	09-38071	20-8487506
Express—North Trail Oilfield Services, Ltd.	09-38072	20-8487526
Express—Ace Rat Hole Service, GP LLC	09-38073	20-8496617
Express—Ace Rat Hold Service, Ltd.	09-38074	20-8496632