

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

<p><b>In re</b></p> <p><b>EXPRESS ENERGY SERVICES OPERATING, LP, et al.,</b></p> <p style="padding-left: 40px;"><b>Debtors.</b></p>	§ § § § § § § § §	<p style="text-align: right;"><b>Chapter 11</b></p> <p style="text-align: right;"><b>Case No. 09-38044</b></p> <p style="text-align: right;"><b>Jointly Administered</b></p>
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**DEBTORS’ WITNESS AND EXHIBIT LIST  
FOR HEARING ON DECEMBER 7, 2009**

**WITNESSES**

Express Energy Services Operating, LP, and its affiliated debtors, as debtors and debtors in possession (collectively, the “**Debtors**”), may call any of the following witnesses, whether in person or by proffer, at the hearing to be held on December 7, 2009, at 2:30 p.m. (prevailing Central Time) (as may be continued, the “**Hearing**”):

- A. Darron Anderson, Chief Executive Officer of the Debtors;
- B. James Davis, Chief Financial Officer of the Debtors;
- C. Dean Swick, Alvarez & Marsal North America, LLC; and
- D. Any witnesses necessary to rebut the testimony of witnesses called or designated by any other party.

**EXHIBITS**

The Debtors may offer into evidence any one or more of the following exhibits at the Hearing:

Exhibit	Description	Offered	Objection	Admitted	Date	Disposition
1	Debtors’ Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code Dated as of October 27, 2009 [Docket No. 17]					

<b>Exhibit</b>	<b>Description</b>	<b>Offered</b>	<b>Objection</b>	<b>Admitted</b>	<b>Date</b>	<b>Disposition</b>
<b>2</b>	Debtors' Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code Dated as of November 3, 2009 [Docket No. 171, ex. A]					
<b>3</b>	Black-Line [Docket No. 171, ex. B]					
<b>4</b>	Notice of Filing of "Clean" and "Black-Lined" Versions of the Debtors' Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code Dated as of November 3, 2009 [Docket No. 171]					
<b>5</b>	Proposed Disclosure Statement for the Debtors' Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 18]					
<b>6</b>	Order Pursuant to Debtors' Emergency Motion to (I) Approve Disclosure Statement and the Form and Manner of Service Related Thereto; (II) Set Dates for the Objection Deadline and Hearing Relating to Confirmation of the Plan; and (III) Authorize Related Relief [Docket No. 44]					
<b>7</b>	Affidavit of Service by Patrick M. Leathem dated November 6, 2009 [Docket No. 81]					
<b>8</b>	Plan Supplement in Support of the Debtors' Joint Plan of Reorganization [Docket No. 172]					
<b>9</b>	Revised Exhibit 5 of the Plan Supplement in Support of the Debtors' Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 177]					
<b>10</b>	Memorandum of Law in Support of Confirmation of the Debtors' Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 179]					
<b>11</b>	Proposed Order Confirming the Debtors' Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 180]					
<b>12</b>	Declaration of Jeffrey S. Stein of The Garden City Group, Inc. Certifying the Methodology for the Tabulation of Votes and Results of Voting With Respect to the Debtors' Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 178]					
<b>13</b>	Declaration of Darron Anderson in Support of Confirmation of the Debtors' Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code					

Exhibit	Description	Offered	Objection	Admitted	Date	Disposition
14	Declaration of James Davis in Support of Confirmation of the Debtors' Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code					
15	Declaration of Dean Swick in Support of Confirmation of the Debtors' Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code					
16	Sources and Uses of Cash					
17	Comparable Public Companies Analysis					
18	Liquidation Analysis [Docket No. 18, ex. C]					

The Debtors reserve the right to supplement or amend this witness and exhibit list at any time prior to the Hearing.

Dated: December 4, 2009  
Houston, Texas

Respectfully submitted,

/s/ Alfredo R. Pérez  
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