

**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 (JB)
	§	
	§	
Debtors.	§	
	§	
	§	
	§	Joint Administration Requested

**DEBTORS' WITNESS AND EXHIBIT LIST
FOR HEARING ON "FIRST DAY" MATTERS**

WITNESSES

Express Energy Services Operating, LP, and its affiliated debtors, as debtors and debtors in possession (collectively, the "**Debtors**"),¹ may call any of the following witnesses at the hearing to be held October 28, 2009 at 2:00 p.m. (CST) (as may be continued, the "**Hearing**") whether in person or by proffer:

- A. Darron Anderson, Chief Executive Officer
- B. James Davis, Chief Financial Officer
- C. Any witnesses necessary to rebut the testimony of witnesses called or designated by any other party.

¹ A list of the Debtors in these chapter 11 cases is attached hereto as **Exhibit A**.

EXHIBITS

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

Exhibit	Description	Offered	Objectio n	Admitte d	Date	Disposition
A.	Declaration of Darron Anderson in Support of the Debtors' Chapter 11 Petitions and First Day Motions					
B.	Debtors' Organizational Chart					
C.	Plan Support Agreement dated as of October 27, 2009, with a copy of a certain Plan Term Sheet and a DIP Facility Summary of Terms and Conditions included therein					
D.	13-Week Budget					
E.	Diagram of Cash Management System					

Dated: October 28, 2009
Houston, Texas

/s/ Alfredo R. Pérez
Alfredo R. Pérez (15776275)

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Attorneys for Debtors
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EXHIBIT A**LIST OF DEBTORS AND CASE NUMBERS**

Debtor	Case No.
Express Energy Services Operating, LP	09-38044
Express Energy Services (2008) LLC	09-38049
Express Energy Services Holding, LP	09-38050
Express Energy Services GP, LLC	09-38051
Express Energy Services CT, LP	09-38053
Express Energy Services Ark, LP	09-38054
Express Energy Services P&A, LP	09-38055
Express Energy Services WL, LP	09-38057
Express – Byrd R&S GP, LLC	09-38058
Express – Byrd R&S Oilfield Services, L.P.	09-38060
Express – MBCC GP, LLC	09-38061
Express – MBCC, Ltd.	09-38062
Express – Mike Byrd Casing Crews GP, LLC	09-38063
Express – Mike Byrd Casing Crews, Ltd.	09-38064
Express – R&S Tong Services GP, LLC	09-38065
Express – R&S Tong Services, Ltd.	09-38066
Express – BAH Leasing GP, LLC	09-38067
Express – BAH Leasing, Ltd.	09-38068
D&D Tongs GP, LLC	09-38069
D&D Tongs, L.P.	09-38070
Express – North Trail Oilfield Services, GP, LLC	09-38071
Express – North Trail Oilfield Services, Ltd.	09-38072
Express – Ace Rat Hole Service GP, LLC	09-38073
Express – Ace Rat Hole Service, Ltd.	09-38074