

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

<b>In re</b>	§	
	§	<b>Chapter 11</b>
	§	
<b>EXPRESS ENERGY SERVICES OPERATING, LP, et al.,</b>	§	
	§	<b>Case No. 09-38044 (JB)</b>
	§	
<b>Debtors.</b>	§	
	§	<b>Joint Administration Requested</b>

**NOTICE OF HEARING OF EMERGENCY “FIRST DAY” MOTIONS**

**PLEASE TAKE NOTICE** that on October 27, 2009, Express Energy Services Operating, LP, (Case No. 09-38044) and its affiliated debtors, as debtors and debtors in possession (collectively, the “**Debtors**”),<sup>1</sup> each commenced a voluntary case under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of Texas, Houston Division.

**PLEASE TAKE FURTHER NOTICE** that a hearing on the following emergency “first day” motions filed by the Debtors will take place on **Wednesday, October 28, 2009 at 2:00 p.m. (CST)** before the Honorable Jeff Bohm, United States Bankruptcy Judge for the Southern District of Texas, Houston Division, at the United States Courthouse, Courtroom 600, 515 Rusk Street, Houston, Texas 77002:

**First Day Motions Set For Hearing:**

- Emergency Motion to (I) Continue Employee Compensation and Health and Welfare Benefit Programs and (II) Satisfy Outstanding Obligations Related Thereto [Docket No. 6].
- Emergency Motion to Use Cash Collateral [Docket No. 8].

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

Additional First Day Motions That May Be Considered At The Hearing:

- Emergency Motion for Joint Administration of Chapter 11 Cases [Docket No. 2].
- Notice of Designation of Complex Chapter 11 Cases [Docket No. 3].
- Emergency Motion for (I) Approval of Procedures to Notify Creditors of the Commencement of the Debtors' Chapter 11 Cases and (II) Authority to Establish Master Service List [Docket No. 12].
- Emergency Application to Retain The Garden City Group, Inc. as Notice, Claims, and Balloting Agent [Docket No. 7].
- Emergency Motion to Continue the Cash Management System [Docket No. 13].
- Emergency Motion to Continue Insurance Programs and Satisfy Outstanding Obligations Related Thereto [Docket No. 14].
- Emergency Motion to Extend Time to File Schedules of Assets and Statement of Financial Affairs [Docket No. 16].
- Emergency Motion to Pay for Goods and Services Received Postpetition [Docket No. 10].
- Emergency Utilities Motion [Docket No. 11].
- Emergency Motion to Pay Certain Sales Taxes, Use Taxes, and License and Permit Fees [Docket No. 15].
- Emergency Motion to Preliminarily Approve the Disclosure Statement [Docket No. 19].

**PLEASE TAKE FURTHER NOTICE** that copies of the above-noted pleadings may be obtained (i) from this Court's website, <http://www.txnb.uscourts.gov> via ECF/Pacer, and (ii) from the Debtors' proposed claims agent's website, <http://www.expressenergyinfo.com>.

**PLEASE TAKE FURTHER NOTICE** that any person desiring to appear via telephone at the hearing should call 713-250-5577 at least 10 minutes before the start of the hearing.

Dated: October 27, 2009  
Houston, Texas

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

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**EXHIBIT A****LIST OF DEBTORS AND CASE NUMBERS**

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