

**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>
---	--------------------------------------	--

**DEBTORS’ WITNESS AND EXHIBIT LIST  
FOR HEARING ON NOVEMBER 6, 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 November 6, 2009, at 9:00 a.m. (prevailing Central Time) (as may be continued, the “**Hearing**”):

- A. James Davis, Chief Financial Officer; and
- B. 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
<b>1</b>	Declaration of Darron Anderson in Support of the Debtors’ Chapter 11 Petitions and First Day Motions (Docket No. 2)					
<b>2</b>	LA. REV. STAT. ANN. §§ 9:4861-4863 (1997)					
<b>3</b>	TEX. PROP. CODE ANN. §§ 56:001-002 (Vernon 2007)					

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

Dated: November 5, 2009  
Houston, Texas

Respectfully submitted,

/s/ Alfredo R. Pérez  
Alfredo R. Pérez (15776275)  
WEIL, GOTSHAL & MANGES LLP  
700 Louisiana Street, Suite 1600  
Houston, Texas 77002  
Telephone: (713) 546-5000  
Facsimile: (713) 224-9511

Attorneys for Debtors  
and Debtors in Possession