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UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

IN RE: §
§
White Energy, Inc. et al § Cause No. 09-11601
§
Debtor/s § Chapter 11

**OBJECTION TO DISCLOSURE STATEMENT RELATING TO THE CHAPTER
11 PLAN OF REORGANIZATION FOR WHITE ENERGY, INC. AND ITS
AFFILIATED DEBTORS FILED BY THE DEBTORS AND WESTLB AG, NEW
YORK BRANCH, AS ADMINISTRATIVE AGENT**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

NOW COMES, Deaf Smith County Appraisal District and Hale County Appraisal District (hereinafter after referred to as "Taxing Entities"), Creditors, and files the following objection to Debtor's Chapter 11 Plan (hereinafter "The Plan").

OBJECTIONS

1. Taxing Entities are taxing jurisdictions within the State of Texas whose secured claim consists of pre-petition, unpaid ad valorem property taxes. The property taxes were duly assessed in accordance with the laws of the State of Texas and constitute a valid, liquidated secured claim pursuant to Texas Property Tax Code §32.01 against the Debtor's property and are entitled to priority over other secured claim under 11 U.S.C. §506 and Texas Property Tax Code, Section 32.05 (b).

2. Hale County Appraisal District is a holder of a secured claim for ad valorem taxes in the amount of \$2,980,132.25.

3. Deaf Smith County Appraisal District is a holder of a secured claim for ad valorem taxes in the amount of \$1,046,105.60.

4. Taxing Entities are entitled to be holders of secured claims and assert that secured claims have been filed prior to the June 2, 2009 deadline.

5. Taxing Entities object to the Plan to the extent that it fails to provide for the payment of interest on Taxing Entities claim, at the rate specified under Section 33.01 (c) of the Texas Property Tax Code from the petition date until paid in full.

WHEREFORE, PREMISES CONSIDERED, Taxing Entities respectfully pray that the Debtor's Chapter 11 Plan not be confirmed, or in the alternative, that Debtor's Plan be altered to include the correct amount of interest and that they be granted such other and further relief as the Court deems proper.

Respectfully submitted,
PERDUE, BRANDON, FIELDER
COLLINS & MOTT, L.L.P.

By: /s/D'Layne Peeples
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document had been mailed on this 7th day of January, 2009 to the following by those who are set up to receive electronic notification and first class mail to the following:

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