24-05-078 Calviz 6621 RECEIVED OCT 04 2024

TO

### MONTANA BOARD OF OIL AND GAS CONSERVATION 2535 ST. JOHNS AVENUE BILLINGS, MONTANA 59102

MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

Full name	of the Owner, Operator, or S	Service Company	Calfrac Well S	Services Corp.	
Address	707 17 <sup>th</sup> St., Suite 2930	Denver	СО	80202	303.293.2931
	(Address)	(City)	(State)	(Zip Code)	(Telephone Number)
fracturing for registry nurside defined of the com-	MCA requires that an owne fluid. This must include the comber of the ingredients, inclin 50-78-102, MCA, the produced ponents of the fracturing flus 30-14-402, MCA.	hemical compound na uding any hazardous uct name, and the ty	ame and the ch components lis se of additive i	nemical abstract sted on a materi used. In limited	s service (CAS) ial safety data sheet situation the identit
	sting that the identity of a fr	acturing fluid compor			
Chamical C	ماكر والملاطنين المحادة وموجودات	analas Canastanas	-Patroleum-e	MON / SQUENITER	W / 11/1 3/1/1
Chemical F	amily associated with the Ch	emical Constituent	<del>Petroleum c</del>	10/3/2024	nic Aci 2 Salt
In order to understand Trade Secre	amily associated with the Ch claim that the identity of the d that I must provide specific et Guidelines. I have attache the Guidelines.	e fracturing fluid com information regardin	oonent is entit g each of the c	led to protection questions set for	n as a trade secret, I th in the MBOGC
In order to understand Trade Secre	claim that the identity of the I that I must provide specific et Guidelines. I have attache	e fracturing fluid com information regardin	oonent is entit g each of the c ing forth inforr	led to protection questions set for	n as a trade secret, I th in the MBOGC
In order to understand Trade Secre set forth in	claim that the identity of the I that I must provide specific et Guidelines. I have attache	e fracturing fluid compine information regarding separate pages sett  CERTIFICA erjury that this requ	ponent is entit g each of the c ing forth inforr TE est and suppo	led to protection questions set for mation in respor	n as a trade secret, I th in the MBOGC nse to the questions
In order to understand Trade Secre set forth in	claim that the identity of the d that I must provide specific et Guidelines. I have attache the Guidelines. clare under penalties of pe	e fracturing fluid compined information regarding separate pages sett certifical certification	est and supported to the contract of the contr	led to protection questions set for mation in respor	n as a trade secret, the in the MBOGC nse to the questions tion have been

### RECEIVED

OCT 04 2024

### TO MONTANA BOARD OF OIL AND GAS CONSERVATION **2535 ST. JOHNS AVENUE BILLINGS, MONTANA 59102**

MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

1.	□ Operator	n of Requesting Party  ⊠ Service Company	☐ Other – Specify	8		
2.	Full name o	f the Owner, Operator, o	r Service Company	Calfrac Well S	Services Corp.	
3.	Address	707 17 <sup>th</sup> St., Suite 2930	Denver	со	80202	303.293.2931
		(Address)	(City)	(State)	(Zip Code)	(Telephone Number)
1.	fracturing flu registry num as defined in of the compo criteria in 30	MCA requires that an own aid. This must include the ober of the ingredients, in 50-78-102, MCA, the property of the fracturing for 14-402, MCA.	e chemical compound nacluding any hazardous oduct name, and the ty fluid may be exempt from	name and the cl components list ope of additive open om public disclo	nemical abstract sted on a materi used. In limited osure as a "trade	is service (CAS) ial safety data sheet situation the identity e secret" under the
		ing that the identity of a mily associated with the		Ethoxylated		as a trade secret.
	understand t Trade Secret	laim that the identity of t that I must provide specit Guidelines. I have attach he Guidelines.	fic information regardin	ng each of the o	questions set for	th in the MBOGC
			CERTIFICA	ATE		
		are under penalties of y me and to the best o	f my knowledge are t Signature Samu	true, correct a	_	
	FOR STAFF APPROVED	291.811.772.0	Signature	<u>.</u> s	nistrator le	10/7/24 Date Fraints 10/7/24

RECEIVED

OCT 04 2024

001 04 2024

# TO MONTANA BOARD OF OIL AND GAS CONSERVATION 2535 ST. JOHNS AVENUE BILLINGS, MONTANA 59102

MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

	ation of Requesting Party				
□ Opera	ator 🛛 Service Company	☐ Other – Specify	<u></u>		
Full nam	ne of the Owner, Operator, o	or Service Company	Calfrac Well S	Services Corp.	
Address	707 17 <sup>th</sup> St., Suite 2930	) Denver	СО	80202	303.293.2931
	(Address)	(City)	(State)	(Zip Code)	(Telephone Number)
fracturing registry registry registering as defined of the co	O3, MCA requires that an owing fluid. This must include the number of the ingredients, is an include the ingredients, is an included in 50-78-102, MCA, the promponents of the fracturing in 30-14-402, MCA.	e chemical compound na ncluding any hazardous o roduct name, and the ty	ame and the checomponents list oe of additive t	nemical abstract sted on a materi used. In limited	s service (CAS) al safety data shee situation the identi
	uesting that the identity of a	ı fracturing fluid compon	ent qualify for	non-disclosure	as a trade secret.
Chemica	I Family associated with the	Chemical Constituent	_Petroleum o	listillates	
ındersta Frade Se	to claim that the identity of and that I must provide spec cret Guidelines. I have attac in the Guidelines.	ific information regardin	g each of the o	juestions set for	th in the MBOGC
ındersta Frade Se	nd that I must provide spec cret Guidelines. I have attac	ific information regardin	g each of the c ng forth infor	juestions set for	th in the MBOGC
ındersta Frade Se	nd that I must provide spec cret Guidelines. I have attac	ific information regardin hed separate pages setti	g each of the c ng forth infor	juestions set for	th in the MBOGC
understa Frade Sei Set forth	nd that I must provide spec cret Guidelines. I have attac	ific information regardin hed separate pages setting the control of the control o	g each of the c ng forth inform TE est and supp	juestions set for mation in respor	th in the MBOGC
understa Frade Sei Set forth	and that I must provide spec cret Guidelines. I have attac in the Guidelines. declare under penalties of	ific information regardin thed separate pages setting CERTIFICA f perjury that this reque of my knowledge are to	g each of the cong forth information.  TE  est and supported, correct and corr	juestions set for mation in respor	th in the MBOGC use to the question

RECEIVED

OCT 04 2024

MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

# TO MONTANA BOARD OF OIL AND GAS CONSERVATION 2535 ST. JOHNS AVENUE BILLINGS, MONTANA 59102

Full manage	of the Owner Oreston as San	- i C	Calfrac Woll 9	Candidas Cara	
	of the Owner, Operator, or Ser	vice Company	cairac weirs	Services Corp.	
Address	707 17 <sup>th</sup> St., Suite 2930	Denver	СО	80202	303.293.2931
	(Address)	(City)	(State)	(Zip Code)	(Telephone Number)
fracturing f registry nur as defined i of the comp	MCA requires that an owner, of luid. This must include the chember of the ingredients, includin 50-78-102, MCA, the production ponents of the fracturing fluid 60-14-402, MCA.	mical compound nar ing any hazardous co t name, and the type	ne and the cl omponents lise of additive	nemical abstract sted on a mater used. In limited	s service (CAS) ial safety data sheet situation the identite
am reques	sting that the identity of a fract	uring fluid compone	nt qualify for	non-disclosure	as a trade secret.
Chemical Fa	amily associated with the Chen	nical Constituent	Proprietary	amide	
n order to	amily associated with the Chen claim that the identity of the fr	acturing fluid compo		ed to protection	•
n order to understand Frade Secre		racturing fluid compo formation regarding	onent is entit each of the c g forth inforr	led to protection	th in the MBOGC
n order to understand Trade Secre set forth in	claim that the identity of the fr I that I must provide specific in et Guidelines. I have attached s the Guidelines.	racturing fluid composition formation regarding eparate pages settin	onent is entit each of the c g forth inforr	led to protection questions set for mation in respor	th in the MBOGC nse to the questions
n order to understand Frade Secre set forth in I dec	claim that the identity of the fr I that I must provide specific in et Guidelines. I have attached s	racturing fluid composite formation regarding eparate pages settin <b>CERTIFICAT</b> ury that this reque	onent is entit each of the o g forth inforr E	led to protection questions set for mation in respon	th in the MBOGC nse to the questions
n order to understand Frade Secre set forth in I dec	claim that the identity of the fr I that I must provide specific in et Guidelines. I have attached s the Guidelines. clare under penalties of perj by me and to the best of my	racturing fluid composition regarding eparate pages setting CERTIFICAT ury that this reques knowledge are trues	each of the cog forth inform  E  st and suppose, correct a  C. Reed, En	led to protection questions set for mation in respon	th in the MBOGC nse to the questions
n order to understand Frade Secre set forth in I dec	claim that the identity of the from that I must provide specific interest Guidelines. I have attached so the Guidelines.  clare under penalties of perjudy me and to the best of my	racturing fluid composition regarding eparate pages setting CERTIFICAT ury that this reques knowledge are trues are	each of the cog forth inform  E  st and suppose, correct a  C. Reed, En	led to protection juestions set for nation in respondent orting information and complete.	th in the MBOGC nse to the questions

RECEIVED

OCT 0 4 2024

### MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

# TO MONTANA BOARD OF OIL AND GAS CONSERVATION 2535 ST. JOHNS AVENUE BILLINGS, MONTANA 59102

Classificatio	on of Requesting Party r   Service Company	☐ Other – Specify			
Full name o	of the Owner, Operator, or S	Service Company	Calfrac Well S	Services Corp.	
Address	707 17 <sup>th</sup> St., Suite 2930	Denver	СО	80202	303.293.2931
	(Address)	(City)	(State)	(Zip Code)	(Telephone Number)
fracturing fl registry nun as defined in of the comp criteria in 30	MCA requires that an owne uid. This must include the comber of the ingredients, include the produced on the produced on the fracturing fluid 14-402, MCA.	hemical compound na uding any hazardous luct name, and the ty id may be exempt fro	ame and the checomponents list oe of additive of m public disclo	nemical abstract sted on a materi used. In limited s osure as a "trade	is service (CAS) It all safety data sheet situation the identity secret" under the
I am reques	ting that the identity of a fra	acturing fluid compor	ent qualify for	non-disclosure	as a trade secret.
Chemical Fa	mily associated with the Ch	emical Constituent	Proprietary	surfactant	
understand Trade Secre	claim that the identity of the that I must provide specific t Guidelines. I have attached the Guidelines.	information regardin	g each of the o	uestions set for	th in the MBOGC
		CERTIFICA	TE		
	lare under penalties of pentage of pentage of the best of r	my knowledge are to	rue, correct a	nd complete.	
FOR STAFF	USE ONLY:	Print name	el C. Reed, Enverage and title	vironinientai Eri	igineer
FOR STAFF APPROVED	USE ONLY: D: ☑Yes ☐No		and title	ev.	91 63
			and title	ev.	10/7/24  Date  Expires 10/7/27

### RECEIVED

TO

### MONTANA BOARD OF OIL AND GAS CONSERVATION 2535 ST. JOHNS AVENUE BILLINGS, MONTANA 59102

OCT 0 4 2024

MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

1.	Classification	n of Requesting Party				
	☐ Operator	☑ Service Company	☐ Other – Specify			
2.	Full name o	f the Owner, Operator, or	Service Company	Calfrac Well S	Services Corp.	
	-					
3.	Address	707 17 <sup>th</sup> St., Suite 2930	Denver	СО	80202	303.293.2931
		(Address)	(City)	(State)	(Zip Code)	(Telephone Number)
4.	fracturing flu	MCA requires that an owner uid. This must include the control of the ingredients line	chemical compound n	ame and the cl	nemical abstract	s service (CAS)
		ber of the ingredients, inc				
		n 50-78-102, MCA, the prod onents of the fracturing flu				•
		)-14-402, MCA.	ind may be exempt no	m public discie	osuie as a traue	secret under the
	I am request	ing that the identity of a fr	acturing fluid compo	nent qualify for	non-disclosure	as a trade secret.
	Chamical Far	mily approinted with the Ch	annian Camatitus at	Urea		
	Chemical Fai	mily associated with the Ch	iemicai Constituent	Orca		
	understand t Trade Secret	laim that the identity of the that I must provide specific Guidelines. I have attache he Guidelines.	information regardir	ng each of the o	questions set for	th in the MBOGC
			CERTIFICA	ATE		
		are under penalties of p y me and to the best of			_	tion have been
			Signature		1 /	
					vironmental En	gineer
	FOR STAFF	LICE ONLY.	Print nam	e and title		
	APPROVED	9400 L	This a		in dutor	10/2/24
	ATTROVED	. <u>La 163</u> LINO	Signature	Tit	le	Date.
			V		inistrator le Exp	ires 10/7/27



October 4, 2024

REDACTED VERSION

Mr. Benjamin Jones, P.E. Montana Board of Oil & Gas Conservation 2535 St. Johns Avenue Billings, MT 59102

RE: Request for trade secret and confidential commercial information (CCI) protection for Calfrac Well Services Corp. product CalVisc<sup>TM</sup> 6621

Dear Mr. Jones:

Calfrac Well Services (Calfrac) is submitting the enclosed request for trade secret using "MBOGC Trade Secret/CCI Guidelines" regarding the chemical compound name and Chemical Abstract Services (CAS) numbers (collectively, "Chemical Identity") of certain ingredients in the friction reducer (aka CalVisc™ 6621) that Calfrac intends to use in fracturing operations in Montana.

Calfrac believes that the Chemical Identity of CalVisc<sup>TM</sup> 6621 ingredients are entitled to protection as trade secret and CCI as the disclosure of CAS numbers and chemical compound names of certain ingredients in Calfrac proprietary products would allow competitors to determine the ingredients of Calfrac products that would result in a loss of economic value and competitive harm to Calfrac.

Accordingly, this letter and its enclosures are submitted to request that Chemical Identity information of CalVisc™ 6630 be exempt from disclosure by the MBOGC on the basis that the information is a trade secret as defined under 30-14-402 MCA.

Attachment I hereto provides the information required to be submitted in accordance with the requirements of the MBOGC Trade Secret Guidelines, and provides the justification for the exemption from disclosure as trade secret pursuant to 82-10-604 MCA.

Attachment II hereto provides public disclosure containing the information for which we request trade secret and CCI protection. The information contained in this attachment will be provided separately and directly by email from Select Chemistry personnel.

We appreciate your consideration for this request and should you require additional information or have any questions, please do not hesitate to contact me at (346) 946-8027 or by email at sreed@calfrac.com.

Respectfully,

**Calfrac Well Services Corporation** 

Samuel Reed

Environmental Engineer

RECEIVED

OCT 0 4 2024

MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS







#### Attachment I - Justification for Trade Secret

- 1. To your knowledge, has the identity of the ingredient, its concentration, or both, as appropriate, been publicly disclosed:
  - i. Pursuant to any federal, state, or local law or regulation? The identity of the ingredients, their combinations, and their use in a friction reducer product has not been publicly disclosed by Calfrac or, to Calfrac's knowledge, anyone else, pursuant to any federal, state, or local law or regulation.
  - ii. In professional trade publications? The identity of the ingredients and their collective use in a friction reducer product has not been publicly disclosed by Calfrac or, to Calfrac's knowledge, anyone else, in professional trade publications.
    - Through any other media or publications available to the public or your competitors? To make the above determinations, Calfrac used the CAS numbers of the substances in this product to search the Groundwater Protection Council (GWPC) FracFocus database and reviewed multiple entries per page of results. As previously mentioned, Calfrac found all the CAS numbers associated with various product usages. Calfrac reviewed compositions of other known friction reducers and found that the products contain the hazardous components for which trade secret protection is sought. However, their use in CalVisc<sup>TM</sup> 6621 or with this combination of ingredients has not been identified. Calfrac then performed a combined literature search using the CAS number and the term "friction reducer". Even though documents existed with the combination search terms for the hazardous trade secret components, there was no public document that identified "friction reducer" with the CAS number for which confidentiality is sought. Calfrac was not able to locate any documentation that mentions all ingredients together for any purpose.
- 2. To what extent is the identity of the ingredient (including its use in the additive) known within the company and what steps have you taken to safeguard the information? Please describe in detail how this information is housed in your company and what steps your employees, officers, agents, and directors take to prevent disclosure of the information to parties outside of your
  - Calfrac has in place numerous safeguards and controls to protect the confidentiality of its product formulations including, but not limited to, safe storage locations for information on proprietary products; marking all hard copies of records containing proprietary Chemical Identity information as confidential and trade secret; limiting access to proprietary Chemical Identity information internally on a need-to-know basis only; and requiring confidentiality agreements when disclosing the proprietary Chemical Identity information or product samples to third-parties. Electronic copies of records containing proprietary Chemical Identity information are protected and maintained on a secure internal network. Employees provided with access to proprietary Chemical Identity information are informed of the value and importance of protecting it. In addition to the Confidential Information and Inventions



iii.

company.

OCT 04 2024

MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS







Agreement signed by all employees, employees with access or exposure to proprietary Chemical Identity information are required to sign an acknowledgement of confidentiality.

- 3. Has any other regulatory body (federal, state, tribal, or local) determined the ingredient identity (including its use in the additive) is not entitled to protection from public disclosure as a trade secret or confidential commercial information? If so, provide a copy of the agency's determination, along with any explanation as to why the Commission should not make a similar determination. Provide any other information concerning prior requests for confidentiality and/or regulatory body determinations you believe is relevant to the Commission's determination.
  - No regulatory body (federal, state, tribal, or local) has determined that the Calfrac trade secret or confidential information is not protected from public disclosure. These products have been used throughout Calfrac's United States operations and have been provided protection from disclosure throughout those jurisdictions.
- 4. How is the identity of the ingredient commercially valuable to the company? In answering this question, please describe why the use of the ingredient in the type of additive is not common knowledge in the industry, including any novel or unusual aspects of the chemical or the use of the chemical in this application.
  - Calfrac has expended a significant amount of effort and money to develop the proprietary product and it is the result of years of extensive research, development testing and oilfield application to customers' wells. Developing products requires an understanding of the geology, the physics of temperatures and pressures and the chemistry of the stimulation fluids. Calfrac devotes significant research and development resources to understand geology, physics of temperatures and pressures, fluid systems for unique geological formations and to develop new and innovative products to more effectively stimulate reservoirs to increase production of oil and gas.
  - For example, CalVisc<sup>TM</sup> 6621 contains components that would not normally be considered or expected as part of a commercial friction reducer formulation. However, the product has proven to be highly successful over many years of commercial use, providing Calfrac with superior operations and technical differentiation. Hence Calfrac feels that dissemination of this commercially valuable knowhow would be highly detrimental to its interest, therefore an application for trade secret protection is requested.
  - If the Chemical Identities of this product were to be available to our competitors or customers, then they could replicate our products and Calfrac would lose its competitive advantage in Montana and throughout the world gained through considerable expense and research.
- 5... Describe the ease or difficulty with which the formula for the additive product could be determined from public disclosure of the ingredient identity. Specifically, explain why the use of the "systems approach" format would not adequately protect your proprietary interest.









- If the proprietary Chemical Identity information were disclosed, then it would not be difficult for Calfrac competitors to "reverse engineer" and determine the proprietary formula of the product.
- There are a limited number of active ingredients and the revealing proprietary Chemical Identity information, even when presented in a systems approach format, would provide others with the active ingredients in the products allowing others to engineer our product for sale and/or use, and thereby, undermining Calfrac competitive advantage. Further, a systems approach may undermine our ability to patent such formulas.









### **Attachment II**

REDACTED Chemical Information for CalVisc™ 6621

Cal	CalVisc™ 6621						
COMPONENT NAME	CAS#	CONCENTRATION					
Organic acid salt	Proprietary	Proprietary					
Water	7732-18-5	Proprietary					
Petroleum distillates	Proprietary	Proprietary					
Ethoxylated alcohol	Proprietary	Proprietary					
Proprietary surfactant	Proprietary	Proprietary					
Urea	Proprietary	Proprietary					
Proprietary amide	Proprietary	Proprietary					



OCT 04 2024

MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS



