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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

Attachment 1
Publicly Available Trade Secret Justification

To demonstrate that the information for which confidentiality is sought constitutes trade secrets or confidential commercial information, you must respond to the following questions and provide the information specified and any supporting documentation (such as previous confidentiality determinations):

- 1. To your knowledge, has the identity of the ingredient, its concentration, or both, as appropriate, been publicly disclosed:**

Innospec Oilfield Services (IOFS) has not released the chemical composition for LFC G4 to any public source. To the best of our knowledge, and in the context of its use in conjunction with LFC G4, the underlying ingredient identities comprising LFC G4 does not appear in any public source.

IOFS has not disclosed the ingredients for LFC G4 via the FracFocus database. To the best of our knowledge the full chemical composition has not been previously disclosed via the FracFocus database by anyone else.

- a. Pursuant to any federal or state law or regulation?**

IOFS has not disclosed the ingredient identity for LFC G4 pursuant to any federal, state or local law or regulation. To the best of our knowledge, and in the context of its use in conjunction with LFC G4, the underlying ingredient identity has not been previously disclosed pursuant to any federal, state or local law or regulation.

- b. In professional trade publications?**

IOFS has not disclosed the ingredient identity for LFC G4 has not been previously disclosed in any professional trade publication. To the best of our knowledge, and in the context of its use in conjunction with LFC G4, the underlying ingredient identity has not been previously disclosed in any professional trade publication.

- c. Through any other media or publications available to the public or your competing oil and gas operators, or service companies?**

IOFS has not disclosed the ingredient identity for LFC G4 has not been previously disclosed through any other media or publications available to the public or competitors. To the best of our knowledge, and in the context of its use in conjunction with LFC G4, the underlying ingredient identity has not been previously disclosed through any other media or publications available to the public or competitors.

- 2. To what extent is the identity of the ingredient, concentrations, or both, as appropriate, are known within the company? 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 company.**

IOFS maintains the composition information as confidential business information by providing limited internal access thereto and requiring employment or confidentiality agreements for anyone to whom the information is disclosed. The composition information is stored in a password-protected database on an internal server with limited employee access. Access to this information is granted strictly on a need-to-know basis. Otherwise, only the product trade names and information included in the SDS sheets and/or listed in the Available to Public non-confidential disclosure.

3. **Has any other federal or state entity determined that the ingredient, concentrations, or both, as appropriate, is not entitled to protection from public disclosure? If so, provide a copy of the agency's determination, along with any explanation as to why the Board 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 Board's determination.**

No other regulatory body (federal, state, tribal or local) determined that the ingredient identity is not entitled to protection from public disclosure as trade secret or confidential commercial information. Instances in which the information may be known by outside parties are strictly limited to situations in which disclosure is required by law. These include disclosures in circumstances consistent with the OSHA hazard communication standard (in which case disclosure is required in order to address a medical emergency or other medical situation) or circumstances consistent with EPA reporting regulations (in which case disclosure is required in the event of an environmental release).

4. **How is the identity of the ingredient, concentrations, or both, as appropriate, commercially valuable to the owner, operator, or service company? In answering this question, please describe why the ingredient, concentrations, or both, as appropriate, is not common knowledge in the industry, including any novel or unusual aspects of the ingredient in this application.**

IOFS has invested considerable time, money, and effort in the research and development of subject fracture performance product component. Public disclosure of the composition of LFC G4 could damage the commercial advantage IOFS realizes from maintaining confidentiality. The composition of the proprietary blend derives economic value from not being generally known and readily ascertainable by competitors who could garner economic value from the disclosure of the blend's composition. The combination of components within the proprietary blend is what affords the unique properties of LFC G4 providing superior suspension characteristics and increased stability of the suspension for the guar and hydration.

5. **Describe the ease or difficulty with which the complete composition of the fracturing fluid, including the ingredient identity, concentrations, or both, as appropriate, could be determined from public disclosure. Specifically, explain why use of the "systems approach" format would not adequately protect your proprietary interest.**

It has taken extensive time, effort and expense to independently produce the unique properties we have achieved in LFC G4. A "systems approach" disclosure will allow our competitors a full chemical formulation. Any skilled chemist with access to the ingredient identity could potentially reverse engineer and develop a competing product. As a result, IOFS would lose its competitive advantage with respect to those companies not only in Wyoming but also throughout the world.

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Attachment 2
IOFS Additive Products To be Used in Montana

NOTE: REDACTED VERSION

Available to Public				
Additive Product	Product Type	Main Ingredient	CAS Number	Max %
LFC G4	Viscosity Modifier	Distillates (Petroleum), hydrotreated light	64742-47-8	40 - 60
		Proprietary	Proprietary	Proprietary
		Propylene Carbonate	108-32-7	<1
		Surfactant	24938-91-8	0.19
		Guar Gum	9000-30-0	60
		Proprietary	Proprietary	Proprietary
		Proprietary	Proprietary	Proprietary

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