

(SUBMIT IN DUPLICATE)

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

RECEIVED

FEB 23 2026

REQUEST FOR TRADE SECRET EXEMPTION

MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

- 1. Classification of Requesting Party  
 Operator     Service Company     Other – Specify Chemical supplier
- 2. Full name of the Owner, Operator, or Service Company Jacam Chemicals, LLC
- 3. Address 11999 E. Hwy 158 Gardendale TX 79758 432-634-4331  
(Address) (City) (State) (Zip Code) (Telephone Number)

4. 82-10-603, MCA requires that an owner, operator, or service company provide the complete disclosure of fracturing fluid. This must include the chemical compound name and the chemical abstracts service (CAS) registry number of the ingredients, including any hazardous components listed on a material safety data sheet as defined in 50-78-102, MCA, the product name, and the type of additive used. In limited situation the identity of the components of the fracturing fluid may be exempt from public disclosure as a "trade secret" under the criteria in 30-14-402, MCA.

I am requesting that the identity of a fracturing fluid component qualify for non-disclosure as a trade secret.

Chemical Family associated with the Chemical Constituent WSI 3730(w) + (s) Organo Phosphonate

In order to claim that the identity of the fracturing fluid component is entitled to protection as a trade secret, I understand that I must provide specific information regarding each of the questions set forth in the MBOGC Trade Secret Guidelines. I have attached separate pages setting forth information in response to the questions set forth in the Guidelines.

CERTIFICATE

Expires 3/3/2029

I declare under penalties of perjury that this request and supporting information have been examined by me and to the best of my knowledge are true, correct and complete.

Cindy Garner  
Signature  
Cindy Garner, Environmental Specialist  
Print name and title

FOR STAFF USE ONLY:

APPROVED:  Yes     No

[Signature]    Administrator    3/3/2026  
Signature    Title    Date

## 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:**

The ingredient contained within WSI 3730w and WSI 3730s for which confidentiality protection is sought has not been identified in hydraulic fracturing scale inhibitors in public documents. To my knowledge this ingredient has not been identified as being a constituent of this particular type of product in any public disclosure forum by Jacam Catalyst or any other party.

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

Jacam Catalyst has not disclosed the ingredient for WSI 3730w and WSI 3730s pursuant to any federal, state, or local law or regulation. There has been no regulatory submission of this products composition, in the context of its use in conjunction with 3730w and WSI 3730s.

After reviewing all federal, state, or local submissions, to the best of our knowledge, there has been no disclosure of the underlying ingredient identity pursuant to any federal, state, or local law or regulation. To the best of our knowledge the full chemical composition has not been previously disclosed.

- b. In professional trade publications?**

Jacam Catalyst has not disclosed the ingredient identity for 3730w and WSI 3730s in any professional trade publication, Jacam Catalyst does not disclose any composition for any of its products in any publications.

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

Jacam Catalyst has not disclosed the ingredient identity for 3730w and WSI 3730s through any other media or publications available to the public or competitors. To the best of our knowledge, in the context of its use in conjunction with 3730w and WSI 3730s, there has not been any public disclosure of any chemical composition for any of its products 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.**

Jacam Catalyst maintains the composition information as confidential business information by providing limited internal access to the secure database system where the information is stored. All employees are required to sign non-disclosure confidentiality agreements. Access is restricted to only the employees whose job duties require it. 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 are available to employees and customers that utilize the product.

- 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). There have been no regulatory disclosures required by law to date for this product.

- 4. How is the identity of the ingredient, concentrations, or both, as appropriate, commercially available 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.**

The composition of any specialty, performance, and innovative products are of high value to Jacam Catalyst and its competitors. Divulgence of the formulation provides a distinct advantage to competitors who offer similar products and services. Disclosure of the trade secret components of this product would cause loss of our competitive advantage that this product demonstrates and would allow other companies to take advantage of our substantial investment of money, corporate resources in innovation, testing, and product development without allowing or providing a mechanism to recuperate these costs, negatively impacting Jacam Catalyst's business.

Jacam Catalyst has invested considerable time, money, and effort in the research and development of subject fracture performance product component. Public disclosure of the composition of 3730w and WSI 3730s could damage the commercial advantage that Jacam Chemicals realizes from the disclosure of the blend's chemical composition. Listing the specific active ingredient and by product would provide information about the identity and supplier of the active ingredient.

- 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.**

Public disclosure of the active ingredient identity for 3730w and WSI 3730s would provide a clear path for competitors to understand and replicate our product. This ingredient is unique in well stimulation but including its identity and including it among a large list of chemicals under a "system approach" disclosure would provide our customer with a full chemical formulation. Although the systems approach is a useful tool in safeguarding proprietary information, including components, it eliminates the benefit of that style of disclosure by disclosing ingredients in a time when the frac fluids used are leaner and more efficient with less chemicals being used in the frac fluid. With fewer chemicals it is significantly easier to identify chemical compositions. For this reason, the ingredients used merits treatment as a trade secret.

### Composition of WSI 3730(w)

<b>Component</b>	<b>CASRN</b>	<b>Wt%</b>	<b>Proprietary</b>
Organophosphonate		5 - 10 %	Trade Secret
Ethylene Glycol	107-21-1	30 - 60 %	
Methanol	67-56-1	10 - 30 %	

### Composition of WSI 3730(s)

<b>Component</b>	<b>CASRN</b>	<b>Wt%</b>	<b>Proprietary</b>
Organophosphonate		10 – 30 %	Trade Secret
Ethylene Glycol	107-21-1	10 - 30 %	
Methanol	67-56-1	10 - 30 %	

### Hydraulic Fracturing Fluid Components Information Disclosure:

Trade Name	Supplier	Purpose	Ingredients	CAS#	% by Max	lbs/component
WSI 3730W	Jacam Catalyst	scale inhibitor	SDS ingredients listed below			7920
WSI 3730S	Jacam Catalyst	scale inhibitor	SDS ingredients listed below			17,739
WSI 3730W	Jacam Catalyst	scale inhibitor	Ethylene Glycol	107-21-1	60	4,752.00
WSI 3730W	Jacam Catalyst	scale inhibitor	Methanol	64-56-7	30	2376
WSI 3730W	Jacam Catalyst	scale inhibitor	proprietary	proprietary	10	792
WSI 3730S	Jacam Catalyst	scale inhibitor	Ethylene Glycol	107-21-1	30	5331.7
WSI 3730S	Jacam Catalyst	scale inhibitor	proprietary	proprietary	30	5331.7
WSI 3730S	Jacam Catalyst	scale inhibitor	Methanol	64-56-7	30	5331.7