

26-13-081

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(SUBMIT IN DUPLICATE)

SEP 28 2026

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

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

REQUEST FOR TRADE SECRET EXEMPTION

1. Classification of Requesting Party

☐ Operator ☒ Service Company ☐ Other – Specify _____

2. Full name of the Owner, Operator, or Service Company

Schlumberger Technology Corporation

3. Address

110 Schlumberger Dr. Sugarland, TX 77478 281-285-8500
(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

~~No~~ Additive XE270

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 10/1/2029

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.

Eric Metcalf-Doetsch

Signature

Eric Metcalf-Doetsch Product Steward
Print name and title

FOR STAFF USE ONLY:

APPROVED: ☒ Yes ☐ No

[Signature]
Signature

Administrator
Title

10/1/2026
Date

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MONTANA BOARD OF OIL &
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Via Overnight Mail

September 23, 2026

Ben Jones, Petroleum Engineer
Montana Board of Oil and Gas Conservation
2535 St. Johns Avenue
Billings, Montana 59102
o. 406.656.0040
f. 406.652.5305

Dear Montana Board of Oil and Gas Conservation
Ben Jones, Petroleum Engineer:

Schlumberger requests the Montana Board of Oil and Gas Conservation except this letter and attachments, designated as confidential business information, from disclosure under Montana Senate Bill No. 299, 30-14-402, MCA. The confidential attachment contains the compositional information and CAS number for each ingredient in the composition for which exception from disclosure owing it's the confidential and trade secret nature.

- 1. To Schlumberger's knowledge, the ingredient identity for which Schlumberger seeks confidentiality protection and its use in an active ingredient of this type does not appear in any public source.**

The identity of [REDACTED] and its use has not been publicly disclosed in the United States in any manner that would connect the CAS Numbers or individual chemical names to the product, by Schlumberger or to Schlumberger's knowledge on the Frac Focus database, pursuant to any federal, state, or local regulation, in professional trade publications, or through any other media or publication available to the general public. Schlumberger takes necessary and pertinent steps to manage confidential business information and limit the identity of our products, including those listed [REDACTED] which are trade secrets and are managed as such within the company. Such management includes employing an internal designation and classification system that labels the product composition as Schlumberger confidential information; designating a product steward to manage access to the product; limiting direct knowledge of the composition to a small number of employees with a demonstrated need-to-know; storing information pertaining to the product compositions in a secure, limited-access space; and requiring confidentiality agreements with laboratories, suppliers, or material packagers. Schlumberger has taken reasonable and appropriate steps under the circumstances to determine the knowledge of relevant individuals with the company. These steps include consultation with the Chemical Disclosure Manager and Product Steward Manager and other relevant individuals within the department who have been involved with this additive and additives of its kind.

- 2. The identity of the ingredient (including its use in the additive) is only known to a limited number of persons within Schlumberger and numerous steps have been taken to safeguard this information.**

In the normal course of business, although Schlumberger discloses the chemical constituents of the fluids used in hydraulic fracturing, it does not disclose the chemical composition of its proprietary products. As mentioned above, Schlumberger takes specific and deliberate steps to protect the confidentiality [REDACTED], including standard operating procedures and internal control mechanisms to limit direct knowledge of the composition to a small number of people on a need-to-know basis. Schlumberger does not share proprietary chemical composition with everyone in the company; it is only shared with those who have a direct and necessary need for the purposes of performing their work activities for Schlumberger, such as those employed to further product development, protecting our intellectual property, or the protection of human health and the environment. The compositional information is stored in a password-protected system, which only a limited number of people have access to.



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In the event Schlumberger must disclose confidential business information outside of the company, it is under the strict use of confidentiality agreements (i.e. NDA, CDA) or other protective provisions. In the rare case disclosure of composition is required by law, Schlumberger will seek advisement through internal legal counsel in an effort to comply with the Occupational Safety and Health Administration or the Environmental Protection Agency. To Schlumberger's knowledge, no such [REDACTED] In no other case will Schlumberger disclose proprietary information outside of the company.

3. **No other federal, state, tribal or local regulatory body has determined that the ingredient identity (including its use in the additive) is not entitled to protection from disclosure as a trade secret or confidential commercial information.**

Schlumberger is not aware of any occurrence in which the chemical compositional or identity information has been determined under Federal or State law, or by any regulatory body to be entitled to adequate protection from disclosure as trade secret or confidential commercial information.

4. **The identity of the ingredients [REDACTED] is commercially valuable and its disclosure can likely cause substantial harm to Schlumberger's competitive business.**

Schlumberger invests millions of dollars annually in researching and developing oilfield treatment chemicals, including hydraulic fracturing fluids and associated additives, including those listed [REDACTED]. Through these efforts, we determine certain fluids and additives that perform advantageously in hydraulic fracturing applications. Schlumberger gains a significant commercial value by identifying and using such composition and additives in its business activities. If Schlumberger trade secret information were to become available to our competition, the commercially significant competitive advantage we have worked to develop through notable research and development efforts would be lost. As a business, our ability to invest in research and engineering and lead in offering new technologies is directly linked to our ability to offer unique solutions to our customers. [REDACTED] a very important product in Schlumberger. The unconventional reservoir is defined by the fact that it cannot be produced economically without a very large volume hydraulic fracture, which relates to the very low permeability of the rock (shales and "tight oil"). Fracturing designs therefore concentrate on maximum reservoir contact and maximum disruption of the rock – in low stress anisotropy regimes, we aim for development of a complex fracture network to maximize surface area, and in naturally fractured reservoirs we aim to open and partially activate and prop the network of natural fractures. We also aim at linking the complexity to the wellbore by way of a reasonably conductive proppant pack of defined geometry. [REDACTED]

Specifically, the [REDACTED]
[REDACTED] Heterocyclic complex polymer intended to protect in this product contributes to the overall efficacy and efficiency of this product [REDACTED]
[REDACTED] and the overall uniqueness of this product.

5. **It would not be difficult to determine the formula [REDACTED] from public disclosure of the ingredient identity.**

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It is very difficult for our competitors to properly acquire chemical compositional information about Schlumberger products, especially employing the system style disclosure format. To reverse engineer the mixture, consisting of various ingredients, would require significant time, high level expertise, and various analytical equipment/methodology. However, while identifying the risks associated with the disclosure of trade secrets and confidential information to the public may be straightforward, assessing the actual impact of these risks may be more difficult. By far, the most significant risk is that, by disclosing a trade secret in public disclosures (which is, by definition, outside the company), the information will lose its status as a "trade secret." Put simply, what was once "secret" is no longer. Although there are certain protective measures in place to prevent a competitor from realizing our trade secrets irrespective of whether our company ultimately secures the information (via system style disclosure), we may have difficulty enforcing our company's trade secrets in an unrelated dispute if the opposition discovers that we voluntarily placed this information in the public domain.



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Attachment 2
SLB products to be used in Montana

Note: Redacted version, available to public

Product Formulation: [REDACTED]

CAS Number	Chemical Name	Percent Range
7732-18-5	Water	60 - 80
[REDACTED]	Heterocyclic complex polymer	[REDACTED]