

Mandatory Disclosure of Hydraulic Fracturing Fluid Composition

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Fracturing Fluid Components

Fracturing fluids are composed of

- Base fluid (typically water)
- Proppants (sand is most common)
- Additives

Typically, the fracturing fluid is about 98 to 99.5% base fluid and proppants.

Types of Additives

- Corrosion inhibitors
- Friction reducers
- Crosslinkers
- Iron control agents
- Surfactants
- Oxygen scavengers
- Biocides
- Scale inhibitors
- Breakers
- Acids
- pH adjusters
- Gels

Mandatory Disclosure

- Arkansas
- Colorado
- Idaho
- Indiana
- Louisiana
- Michigan
- Mississippi
- Montana
- New Mexico
- North Dakota
- Ohio
- Oklahoma
- Pennsylvania
- Texas
- Utah
- West Virginia
- Wyoming

Rotary Drilling Rigs Operating, 3/22/13

Location	# of Rigs (based on Baker Hughes website data)	% of Total Rigs	% of Rigs Not on OCS
State with Mand. Disc.	1612	92.3%	95.2%
State Considering Mand. Disc.	81	4.6%	4.8%
Not Clear if Considering M.D.	1	0.1%	0.1%
OCS Waters	52	3.0%	N/A

Ways in Which Disclosure Rules Differ

- MSDS chemicals or all chemicals
- Trade secret challenges
- CAS numbers or not
- Platform for disclosure
- Are trade secrets disclosed to regulators
- Disclosure before and after or just after

The Important Differences

- MSDS chemicals or all chemicals
- Trade secret challenges
- CAS numbers or not

Less Important

- Are trade secrets disclosed to regulators
- Disclosure before and after or just after



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