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
- Idaho
- Louisiana
- Mississippi
- New Mexico
- Ohio
- Pennsylvania
- Utah
- Wyoming
- Colorado
- Indiana
- Michigan
- Montana
- North Dakota
- Oklahoma
- Texas
- West Virginia
## Rotary Drilling Rigs Operating, 3/22/13

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