Law of Hydraulic Fracturing in Texas and Beyond

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- ExxonMobil, 27 years
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Gray Reed & McGraw

- Over 130 attorneys
- Full-service, commercial law firm
- Offices in Dallas & Houston
- Opened in 1985
- Energy section was ranked in the 2017 "Best Law Firms" list by *U.S. News & World Report* and *Best Lawyers*.

Law of Hydraulic Fracturing: Why Bother?

- *"The current chaotic channels of information and opinions in newspapers, editorials, videos, films and other media [about fracking] do not allow for constructive debate or exchange of information between groups. As a result of this chaos, misinformation accrues and clouds public perception…." Monika Ehrman.*
- Policy makers, lawyers, landmen and others can benefit from having a summary of the law of hydraulic fracturing at both state and federal levels.

Law of Hydraulic Fracturing: What is Meant?

- Sufficiently complex as to avoid easy summary; very intertwined with other areas of oil and gas regulation
- States, not the federal government, have taken the lead in legal development
  - Justice Brandeis observation (states as "laboratories" for the nation)
  - Plus federal regulation limited to federal lands
  - Federal offshore horizontal drilling/hydraulic fracturing operations are infrequent

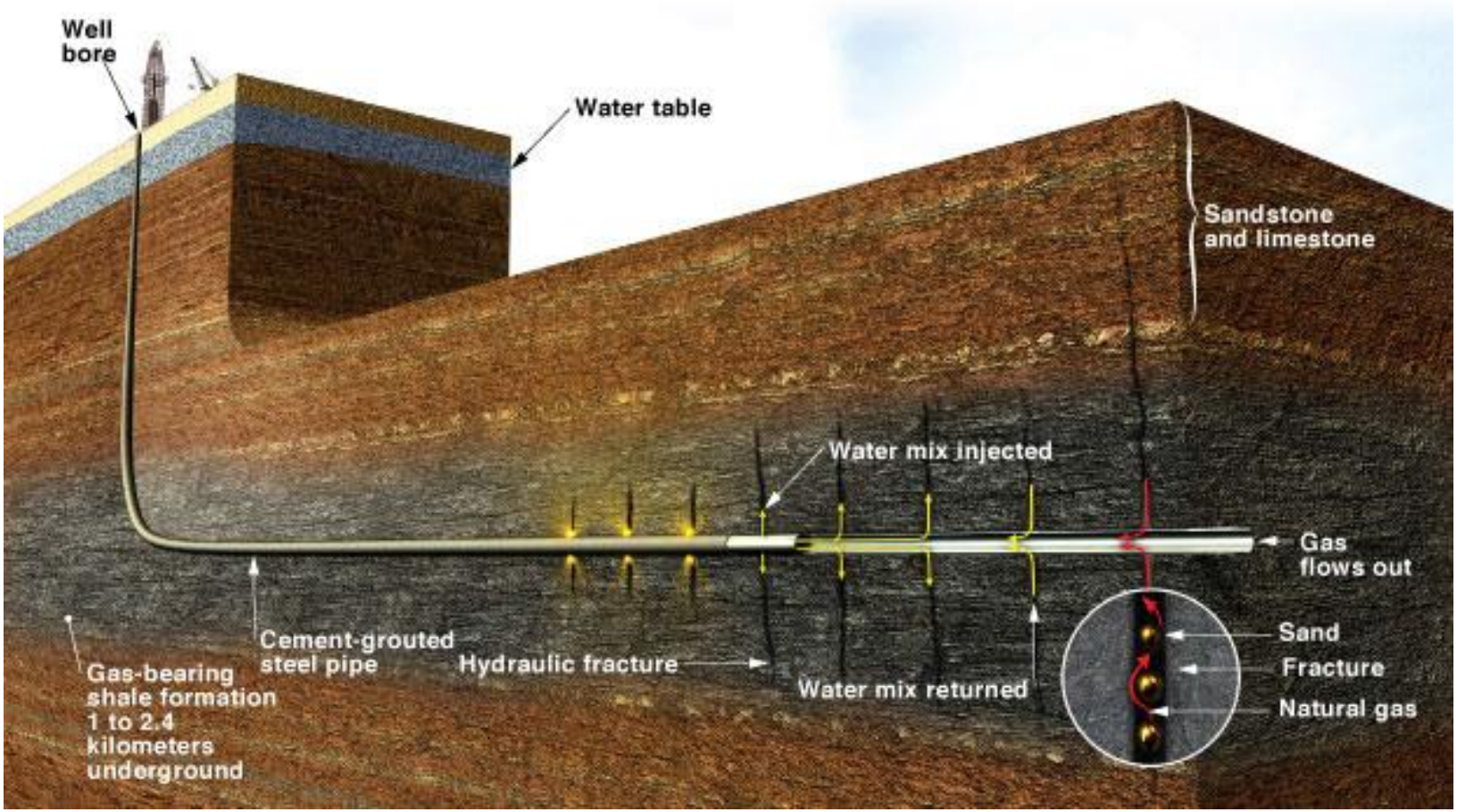
Law of Hydraulic Fracturing: Three Basic Components

1. Legislative
2. Regulatory
3. Litigation
   - Pre-emption
   - Tort Claims
   - Other
     - Rulemaking challenges
     - Permit challenges
     - Citizen's suits
     - Contract claims

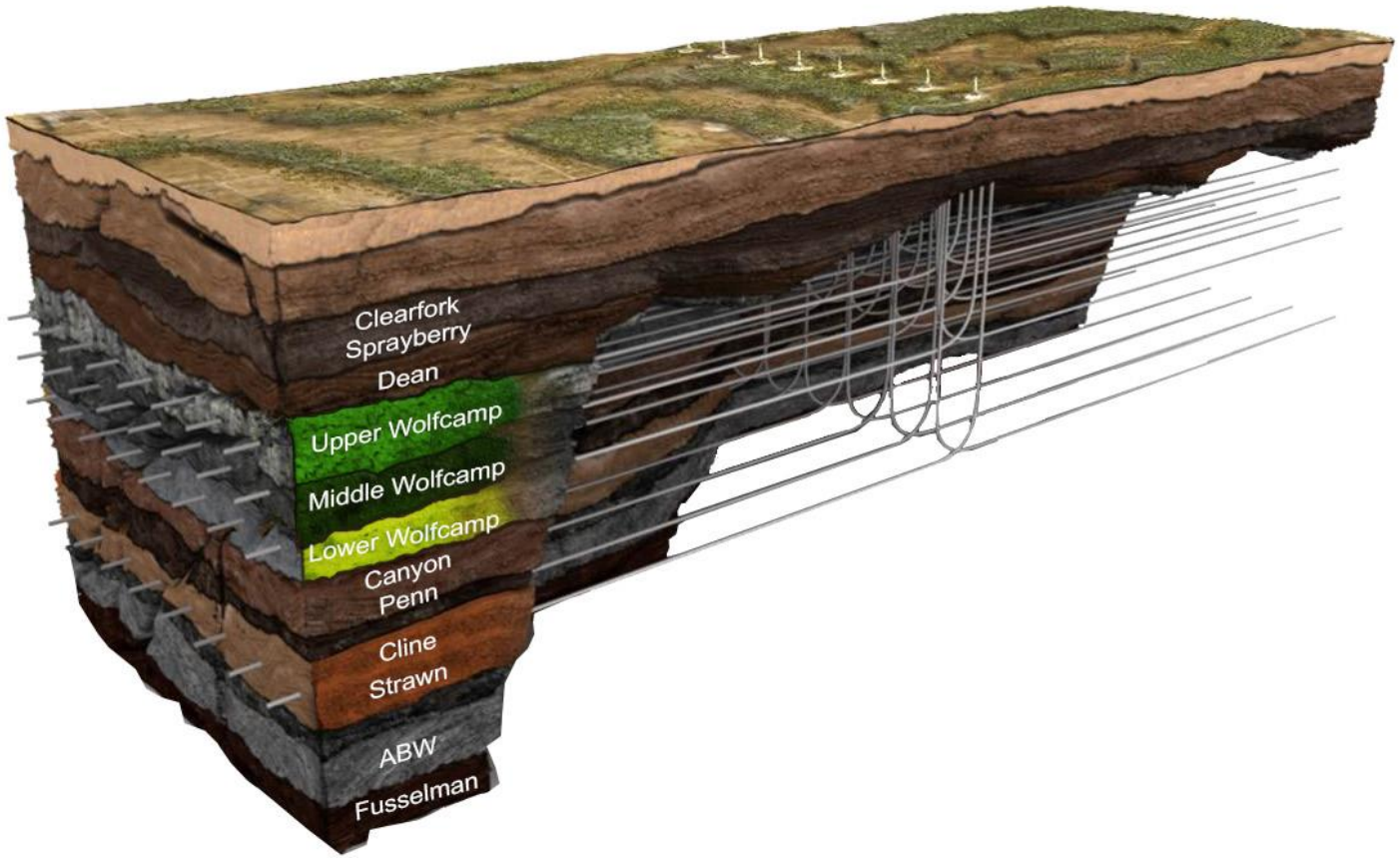
What is Hydraulic Fracturing?

(J) Hydraulic fracturing treatment—A completion process involving treatment of a well by the application of hydraulic fracturing fluid under pressure for the express purpose of initiating or propagating fractures in a target geologic formation to enhance production of oil and/or natural gas. The term does not include acid treatment, perforation, or other non-fracture treatment completion activities. TEX. ADMIN. CODE § 3.13(2)(J)

What is Hydraulic Fracturing?



What is Hydraulic Fracturing?



Hydraulic Fracturing Viewed From the Surface

History/Fracturing

- 1860s: First fractured wells (Pennsylvania - nitroglycerin)
- 1930s: Non-explosive fracturing (acid stimulations)
- 1947: First hydraulically fractured well (Kansas)
- 1949: First hydraulically fractured well in Texas
- By the 2000s: Worldwide, over 2.5 million fractured wells. 1 million in USA alone.

History/Horizontal Drilling

- 1929: First horizontal well - Texon, Texas
- 1980s and 1990s: Horizontal drilling in Austin Chalk in Texas
- In 1990, of 1,000 horizontally drilled wells in the world, 850 were drilled in Austin Chalk. But still, horizontal wells were less than 1% of all wells drilled in USA.
- Throughout 1990s horizontal drilling and fracturing techniques progressed, but low prices slowed development.

2007 and Forward Shale Revolution: The Marriage of Horizontal Drilling and Hydraulic Fracturing

George Mitchell: 1919-2013

Benefits of Hydraulic Fracturing

1. Reduced dependence on foreign oil
2. Economic growth and jobs
3. Has made US manufacturing more competitive
4. Greenhouse gas reduction
5. Reduced gasoline and electricity prices for consumers
6. Additional tax revenues local, state and federal
7. Reduced surface impacts
   - Well consolidation
   - Pad drilling

Concerns about Hydraulic Fracturing (TAMEST REPORT and other sources)

- Water Quality and Quantity
  - Injection of chemicals underground
  - Water usage
- Earthquakes
- Air Quality
- Land Resources
  - Wildlife and plant impacts
- Transportation
  - Roads impact
  - Noise
  - Increased risks of spills
- Economic and Social
  - Occupational safety
  - Religious (Standing Rock)
  - Other

State Regulation of Hydraulic Fracturing: One Size Does Not Fit All

Bans or Moratoriums on Hydraulic Fracturing

- Vermont (2012)
- New York (2015)
- Massachusetts (2016)
- Maryland (Oct. 2017, for 2 ½ years)

[Plus France, Northern Ireland, Quebec, Bulgaria, Costa Rica, other foreign countries]

Comprehensive Regulation

- Illinois
- California
- Pennsylvania
- Alaska

Incremental Regulation

- Colorado
- Louisiana
- Ohio

More Measured Incremental Regulation

- Texas
- Oklahoma
- North Dakota
- Montana
- Wyoming
- Alabama

Minimal or No New Regulation (Except for Chemical Disclosures)

- Mississippi
- Nebraska
- Kansas
- New Mexico
- Utah

What Types of Regulations do States Impose?

1. Disclosure of fluid constituents (reporting requirements, trade secrets)
2. Notices and reports to the state (before and after)
3. Other notices (local govts, the public)
4. Technical requirements (equipment, pressure, others)
5. Testing to ensure well bore integrity (before, during, & after)
6. Water Management
7. Handling and Storage of Materials (chemicals, proppants)

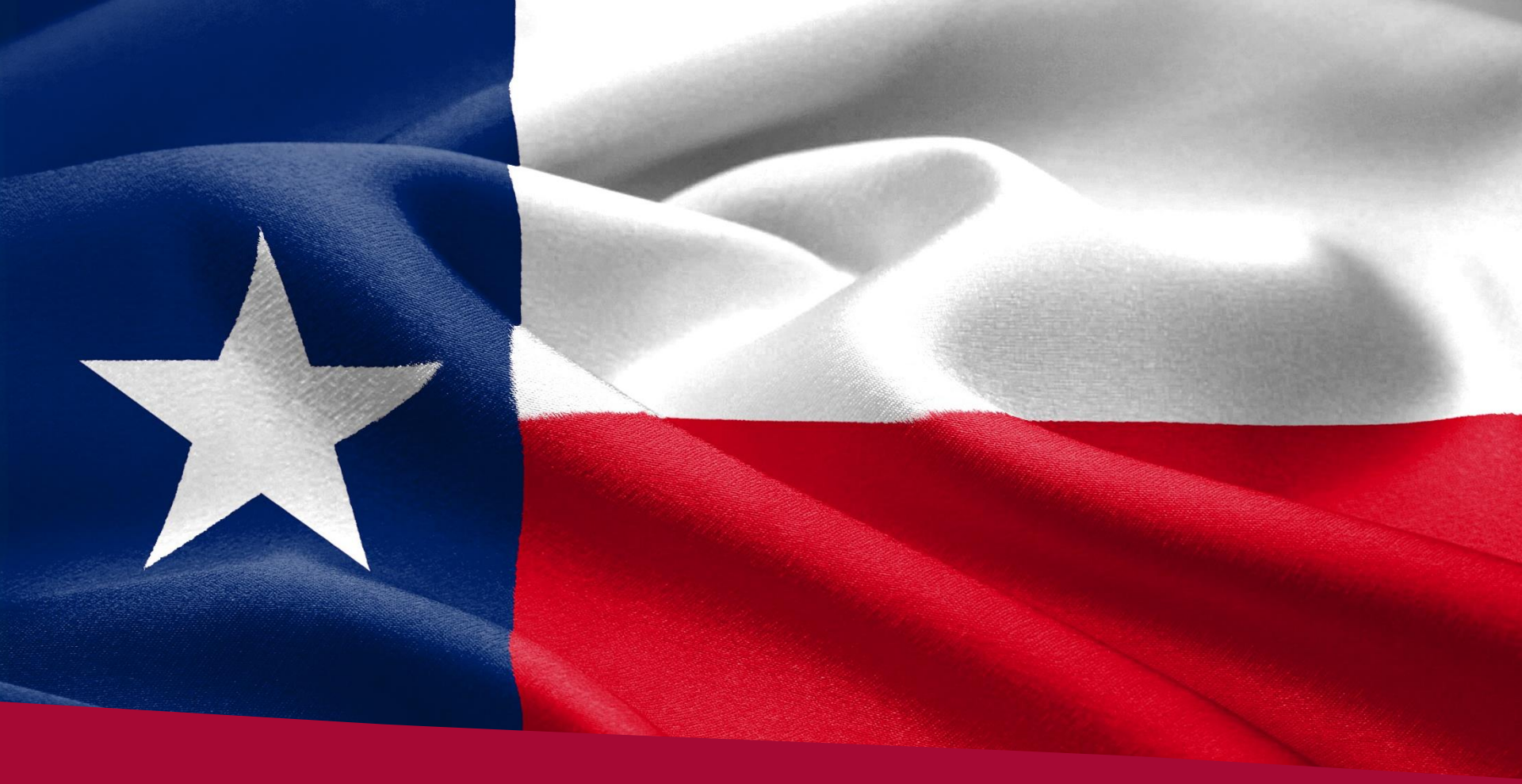
What Types of Regulations Do States Impose?

8. Air Quality (reduced emission completions, engine emissions, flaring, other requirements)
9. Ground Water Protection (containment, monitoring, other requirements)
10. Waste Management (tanks, pits, other requirements)
11. Noise
12. Traffic
13. Seismicity
14. Offset distances
15. Local government authority to ban or regulate hydraulic fracking

Illinois Hydraulic Fracturing Regulatory Act

225 Ill. Comp. Stat. Ann. § 732/1-1 *et seq*. (2013)

- Most comprehensive hydraulic fracturing regulatory provision in nation. Supplements more general regulatory requirements applicable to all oil and gas operations. Does not pre-empt local regulation.
- Includes required notices to offset owners plus newspaper notices, calls for pubic comments, successive public comment periods, public hearings can be demanded by "any person having an interest that is or may be adversely affected."
- Highly detailed planning, implementation, monitoring and reporting requirements, both before and after fracturing.
- Criminal penalties for violation. Only one permit applied for since enactment (in 2017). Permit rejected. Permit applicant re-applying.



What Type of Concerns Does Texas Address?

What Types of Concerns Does Texas Address?

1. Chemical Disclosures
2. Well Integrity, testing, technical treating requirements
3. Notices
4. Seismicity
5. Local bans on hydraulic fracturing

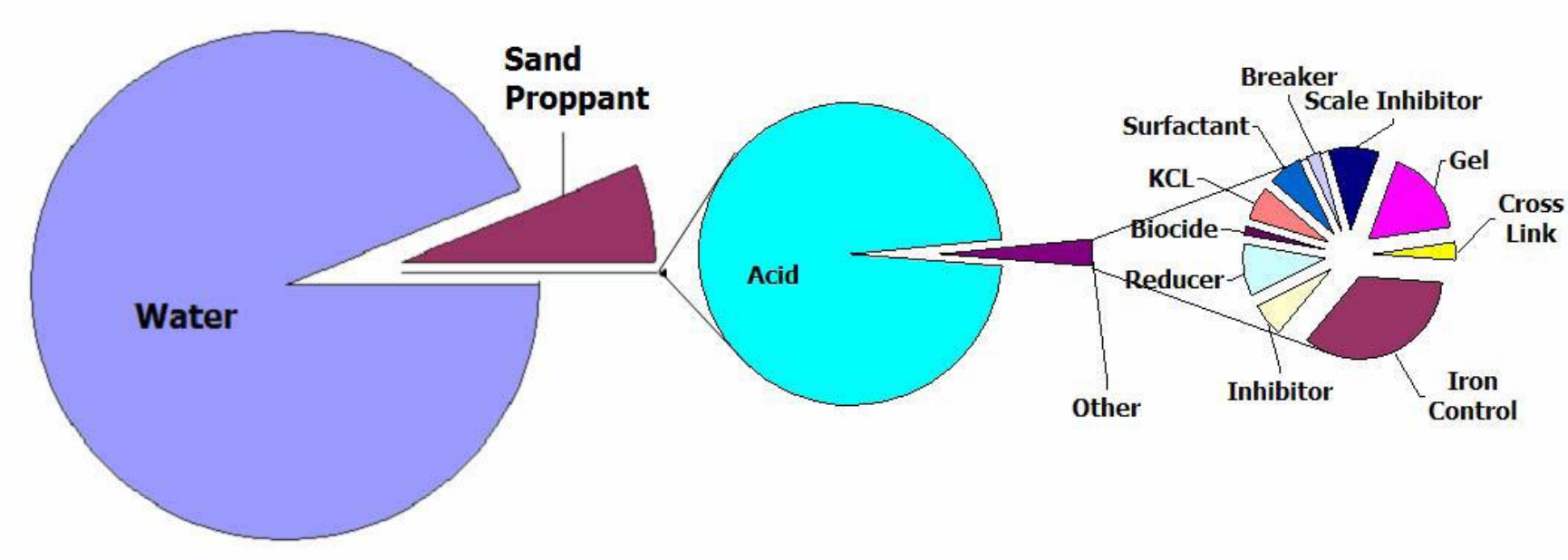
Texas: Chemical Disclosures

- In Texas, *"… the loudest call from citizens was for disclosure of the chemicals that were being injected down wells during the fracturing process and the threat posed to groundwater supplies*."

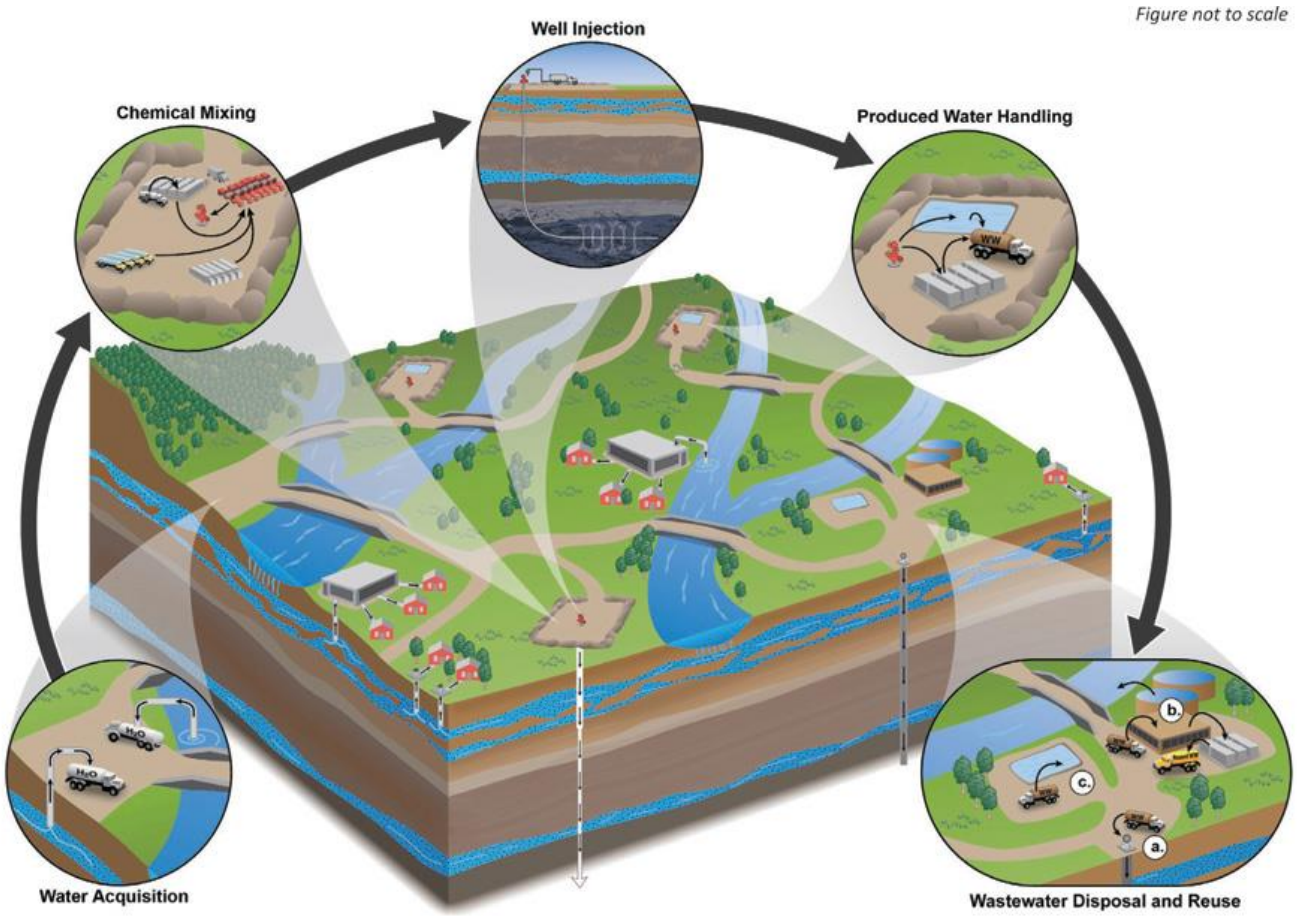
Texas: Chemical Disclosures

- The 82nd Texas Legislature passed HB 3328 in 2011. Codified in Texas Natural Resources Code Subchapter S, § 91.851, "Disclosure of Composition of Hydraulic Fracturing Fluids."
- The Texas Railroad Commission then enacted Statewide Rule 29 to implement the new law which applies to any fracking treatment on a well conducted after February 1, 2012. 16 TEXAS ADMINISTRATIVE CODE § 3.29(b)
- The law and accompanying TRRC rule requires disclosures of Hydraulic Fracturing Fluids on the FracFocus website as well as in accompanying TRRC filings.
- Provisions for Trade Secret protection are embedded in the statute and the accompanying rule.

Hydraulic Fracturing Proppant



Digression: Water Usage in Hydraulic Fracturing Operations



Texas: Wellbore Integrity Requirements

- Wellbore integrity requirements are the first line of defense in protecting underground aquifers from pollution by oil and gas producing operations.
- TRRC Rule 13 establishes the technical standards for casing and cementing oil and gas wells plus blowout prevention. 16 TEXAS ADMINISTRATIVE CODE § 3.13.
- Rule 13 was amended in 2013 to include specific well integrity, casing and cementing requirements applicable to all hydraulically fractured wells spudded after January 1, 2014.

Texas: Wellbore Integrity Requirements

- TRRC Rule 13 is very long and highly technical. It is written for engineers and other technical personnel, not lawyers. Its requirements include (16 TEXAS ADMINISTRATIVE CODE § 3.13(a)(7)(A) through (C):
- Minimum internal yield pressure ratings for casing strings and fracture tubing. Rule 13(a)(7)(A).
- Pressure tests on casing or fracture tubing. Rule 13(a)(7)(B).
- Requires monitoring of all anulli and suspension of operations if issues arise. Rule 13(a)(7)(C).

Texas: Wellbore Integrity Requirements

Rule 13 has special requirements for “minimum separation wells,” which are wells (Rule 13(a)(2)(L)):

- Where the distance between usable groundwater formations and the formation to be fractured is less than 1,000 feet;
- Wells in which TRRC has otherwise determined there to be inadequate separation between fractured formations and usable quality water or that are in areas with structurally complex geology as determined by TRRC.

Texas: Wellbore Integrity Requirements

- If a well is determined to be a “minimum separation well, “ then special cementing, pressure testing, and evaluation and monitoring requirements become applicable (Rule 13 (a) (7)).
- Note: It would be highly improbable, given Texas geology, that an operator would be hydraulically fracturing a horizontal shale well within 1,000 feet of a drinking water aquifer.
- The 2013 changes to Rule 13 were made after studies had concluded that Texas had fallen behind some other states with respect to its well integrity rules.
- Revised Rule 13 was praised, even by the Environmental Defense Fund, and has once more making Texas a leader in well integrity practices.

Texas: Hydraulic Fracturing Notice Requirements

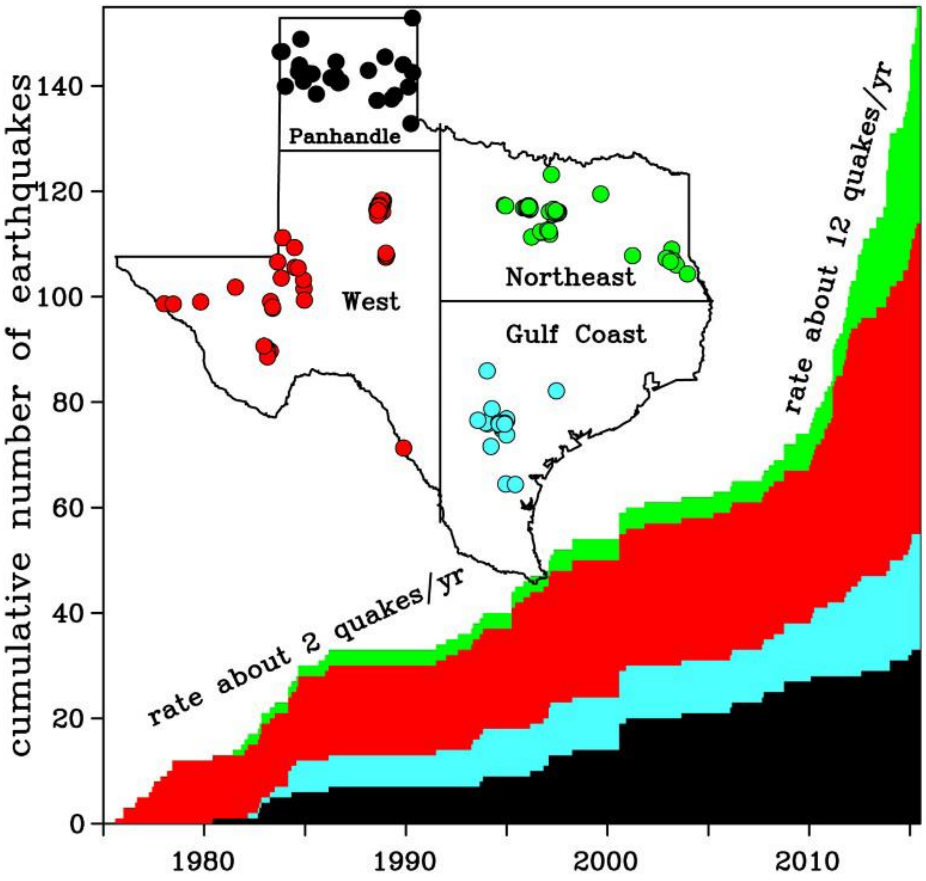
- TRRC Rule 16 (b) (1) requires operators to file a well completion report within 90 days after completion of a well, or within 150 days after the date drilling operations were completed, whichever is earlier.
- TRRC Form W-2 completion report asks whether a hydraulic fracturing treatment was performed? Form W-2 also requires disclosure of the amount and kind of material used and the depth intervals where the operation occurred.
- Municipalities in Texas have enacted ordinances requiring notices before hydraulic fracturing activities. City of Flower Mound Ordinances, Article VII, Section 34-420 2(f). (Arguably authorized by HB 40 (Texas Natural Resources Code §81.0523) under the "commercially reasonable" exceptions permitting exercise of local police powers over hydraulic fracturing.)

Texas: Seismicity

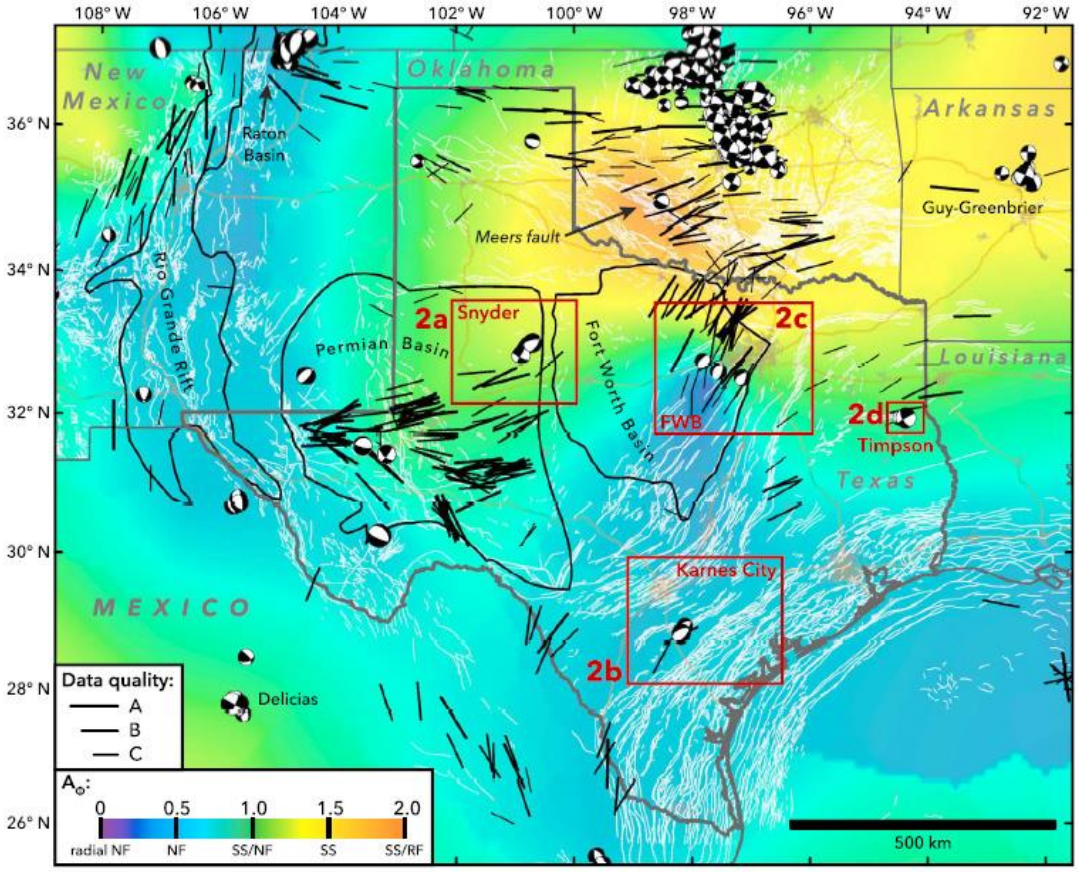
PERSPECTIVE:

According to an April, 2015 Southern Methodist University study, 99.9% of injection wells in the Barnett Shale region of North Texas, an area where hydraulic fracturing has been extensively utilized, have not been associated with earthquakes that could be felt by citizens.

Texas: Seismicity



Texas: Seismicity



Texas: Seismicity

TRRC in 2014 amended Statewide Rules 9 and 46 to make the following changes to injection well permit procedures:

- Applicants must provide a printed copy or screen-shot that shows the results of a survey review or information in the U.S. Geological Survey database regarding the locations of any historical seismic events with a 100-square-mile circle centered on the proposed disposal well. Rules 9(3)(B) and 46(b)(1)(C).

Texas: Seismicity

- The Commission may require additional information, such as logs, geologic cross sections, and pressure front boundary calculations to show that disposal fluids will remained confined if the well is operated in areas where there is an increased risk of fluid migration. Rules 9(3)(C) and 46(b)(1)(D).

- Operators of disposal wells must perform monthly monitoring and report annual injection rates and pressure, but the Commission may require more frequent monitoring and reporting in areas where conditions may increase the risk of fluid migration. Rules 9(3)(D) and 46(i).

Texas: Municipal Bans on Hydraulic Fracturing

- November 4, 2014: Denton voters pass a hydraulic fracturing ban, criminalizing a standard industry practice.
- Subsequently, the 84th Texas Legislature passes HB 40, effective May 18, 2015, codified in Texas Nat. Res. Code § 81.0523.
- HB 40 pre-empts municipal and other local regulation of hydraulic fracturing except for certain limited exercises of municipal police powers in § 81.0523 (c). Even then, the ordinances cannot be commercially unreasonable and cannot prohibit oil and gas operations which are conducted by a reasonably prudent operator. § 81.0523 (c) (2) & (3).

Texas: Municipal Bans on Hydraulic Fracturing

(b) An oil and gas operation is subject to the exclusive jurisdiction of this state. Except as provided by Subsection (c), a municipality or other political subdivision may not enact or enforce an ordinance or other measure, or an amendment or revision of an ordinance or other measure, that bans, limits, or otherwise regulates an oil and gas operation within the boundaries or extraterritorial jurisdiction of the municipality or political subdivision.

Hydraulic Fracturing Litigation

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Three Primary Areas

1. Preemption
2. Tort Claims
3. Other
   - Rulemaking challenges
   - Permit challenges
   - Citizen's suits
   - Contract claims

Preemption

- Express Preemption
- Implied Preemption
- Operational preemption
  1. Does the local rule materially or substantially impede or destroy a state interest; or
  2. Whether the local rule authorizes what the state law forbids or vice versa.

Robinson Twp. v. Commonwealth of PA, 52 A.3d 463 (Pa. Commw. Ct. 2012), *aff'd in part, rev'd in part,* 83 A.3d 901 (Pa. 2013)

- *Background*: Multiple municipalities, organizations and individuals challenged Act 13. In order to promote the development of the Marcellus Shale, the governor of Pennsylvania enacted Act 13 – PA's Unconventional Gas Well Impact Fee Act.
- Act 13 implemented Ch. 33 of title 58 (the Oil & Gas Act of 1984). This new chapter was intended to promote reasonable development of the Commonwealth's oil and gas resources by restricting the ability of local municipalities to adopt their own patchwork of regulations on oil and gas operations. Act 13 also restricted local municipalities from enacting more restrictive zoning ordinances and gave the Dept. of Environmental Protection authority over well permitting, site restrictions, etc.
- *Holding*: Many of the substantive provisions were found to be unconstitutional.

Range Res. Appalachia, LLC v. Salem Twp.
964 A.2d 869 (Pa. 2009)

- *Background*: Salem Township enacted an ordinance that regulated surface and land development associated with oil and gas drilling operations. The ordinance required operators to obtain permits from the town; imposed bonding requirements; regulated locations, designs, and construction of access roads, gas transmission lines, water treatment facilities, and well heads; established requirements for site access and restoration; established a complaint system; and granted the town authority to enforce through fees and imprisonment. Oil and Gas producers sued alleging that the ordinance was preempted by Pennsylvania's Oil and Gas Act.
- It was noted that the ordinance was much more than a traditional zoning ordinance and regulated technical aspect of oil and gas activities.
- *Holding*: The ordinance was preempted by the Oil and Gas Act.

Wallach v. Town of Dryden,
16 N.E.3d 1188 (N.Y. 2014)

- *Background*: The town of Dryden amended its zoning ordinance to ban all activities related to oil and gas exploration, extraction, and storage, effectively banning hydraulic fracturing. Norse Energy Corp. (which had 22,000 leased acres in Dryden) challenged the ban on the grounds that it was preempted by the Oil, Gas and Solution Mining Act, which contained a suppression clause.
- *Holding*: The court gave a narrow interpretation to the suppression clause and held that the OGSML did not preempt the ordinance.

St. Tammany Parish Gov't v. Welsh,
199 So.3d 3 (La. Ct. App. 2016)

- *Background*: Helis obtained a drilling permit to drill a well in the a suburban area as designated in the parish zoning map. The Parish sued the Commission seeking declaratory relief that the local zoning ordinance made the drilling permit illegal.
- La. Rev. Stat. Ann. 30:28F provided that a political subdivision is "hereby expressly forbidden…to prohibit or in any way interfere with the drilling of a well…by the holder of…a [duly-authorized] permit."
- *Holding*: Held that the legislature clearly intended to expressly preempt the area of law. Thus, the zoning ordinance was preempted by state law, as far as they affect the state's regulation of oil and gas activity.

3*City of Longmont v. Colorado Oil & Gas Ass'n*
69 P.3d 573 (Colo. 2016)

- *Background*: In 2012, the citizens of Longmont voted to ban hydraulic fracturing within the city. The Colorado Oil and Gas Association sued the city to invalidate the regulation based on preemption.
- *Holding*: The court found that that there was implied preemption because the ban prevented the use of hydraulic fracturing, even if the operator complied with the COGCC rules and regulations.
- A second similar case, *City of Fort Collins v. Colorado Oil and Gas Association,* 369 P.3d 586 (Colo. 2016), had the same outcome with the court, holding that a 5 year moratorium on hydraulic fracturing was preempted by the Conservation Act.

Tort Claims

- While referred to as hydraulic fracturing cases, many of the actual allegations concern other aspects of oil and gas operations:
  - Ground and/or surface water contamination
  - Air emissions
  - Seismic activity
  - Noise, light, traffic and other disturbances
- Claims usually include: nuisance, negligence, trespass, strict liability for an abnormally dangerous activity, and negligence.

Tort Claims

- To date, fewer than 100 cases filed, and most of those are in eight states (Arkansas, Colorado, Louisiana, New York, Ohio, Pennsylvania, West Virginia, and Texas)
- Of those cases, only three cases have been tried involving surface owner claims.

Parr V. Aruba Petroleum,
2017 Tex. App. LEXIS 873 (Tex. Ct. App. Feb. 1, 2017)

- *Background*: The Parrs sued Aruba and a number of their service companies for causing "environmental contamination and polluting events." Among the numerous complaints , it was also alleged that Aruba created a nuisance through air contamination, light pollution, and offensive noise and odors.
- Under Texas law, to prevail on a private nuisance claim, a plaintiff must be able to prove that the defendant "acts for the purpose of causing' the interference or 'knows that [the interference] is resulting or is substantially certain to result' from the defendant's conduct." The evidence presented to show intention was (i) complaints by a neighbor; (ii) complaints to the TCEQ; and (iii) complaints to Aruba.
- *Holding*: The appellate court found the evidence insufficient because the evidence did not establish that "Aruba actually intended or desired to create an interference on the Parrs' land that the claim was a nuisance or believed that an interference would result." The appellate court reversed the trial judgment and rendered a take-nothing judgment in favor of Aruba.

Ely v. Cabot Oil & Gas Corporation, 2017 U.S. Dist. LEXIS 49075 (M.D. Pa. Mar. 31, 2017)

- *Background*: In 2008, the plaintiffs sued Cabot for injuring their access to safe water from the wells on their property by polluting the water well as the result of the defendants' natural gas drilling operations near their homes. The allegations included breach of contract, fraudulent inducement, private nuisance, negligence, negligence *per se*, violations of environmental laws, and that natural gas drilling was an abnormally dangerous activity subject to strict liability. All claims were dismissed, expect for negligence and private nuisance.
- *Holding*: The jury found for the plaintiffs and awarded $4.24 million; however, the appellate court vacated the judgment.

Hiser v. XTO Energy, Inc.
2013 U.S. Dist. LEXIS 57841 (E.D. Ark. Apr. 23, 2013) and 2013 U.S. Dist. LEXIS 14067 (E.D. Ark. Sept. 30, 2013)

- *Background*: The plaintiff sought to recover for damage to her house allegedly caused by XTO's drilling operations. Hydraulic fracturing had not been discussed during the trial by either party. However, during deliberations it was reported that several jurors discussed hydraulic fracturing and asked the court whether hydraulic fracturing operations had been conducted. The court responded by saying that you have all of the evidence necessary in this case. The jury ultimately found for the Plaintiff and awarded her $100,000.
- *Holding*: XTO moved for a mistrial based on the jurors conversation. The court denied the motion holding that the court's instruction to the jury eliminated any risk of prejudice and XTO didn't show that the hydraulic fracturing discussion has prejudiced or altered the verdict.

Tucker v. SW Energy Co.,
2012 U.S. Dist. LEXIS 20697 (E.D. Ark. Feb. 17, 2012)

- *Background*: (One of the only true hydraulic fracturing cases.) The Plaintiffs sued alleging nuisance, trespass, negligence and strict liability. They claimed that hydraulic fracturing contaminated the Tuckers' water well and the Berrys' air. The complaints were based on conclusions and general statements, such as: wells have been fractured within a mile of the property; the water well used to be fine, but then started to smell. Neither plaintiff showed proof that the SW Energy wells did anything to cause the contamination.
- *Holding:* The court found that the Plaintiff's allegations were "too thin on some critical facts" because they only used general statements and didn't plead specific facts.

Tort Claims

- Some producers have sought dismissal based on the claim that oil and gas activities, as a matter of law, are not abnormally dangerous or ultra-hazardous. However, courts are reluctant to decide this question on a motion to dismiss due to the fact-intensive nature.
- Factors that will be considered:
  - (a) existence of a high degree of risk of some harm; (b) likelihood that the harm will be great; (c) inability to eliminate the risk through reasonable case; (d) extent that the activity is not common; (e) inappropriateness of the location; and (f) value to the community.

Tort Claims

- A few cases have been tried involving subsurface claims:
  - *Coastal Oil & Gas Corp. v. Garza Energy Trust*, 268 S.W.3d 1 (Tex. 2008) – involved a claim that Coastal's hydraulic fracturing operations cross a leased boundary and drained gas under the neighboring tract. The district court and appellate court found for the Plaintiff. The Texas supreme Court reversed.
  - *Max Oil v. Range Resources*, 2017 U.S. App. LEXIS 4424 (10th Cir. Mar. 14, 2017) – involved trespass and nuisance claims based on allegations that Range's hydraulic fracturing treatments in the Mississippian formation deceased oil and gas production from three older wells completed in the Red Fork and Oswego Formations. The matter was ultimately dismissed as being barred under Oklahoma's 2 year statute of limitations.

Tort Claims by Surface Owners

- Several cases have been brought by severed surface owners against the lessees:
  - *Whiteman v. Chesapeake Appalachia, LLC,* 729 F.3d 381 (4th Cir. 2013) (*see* next slide)
  - *Kartch v. EOG Resources, Inc*., 845 F. Supp. 2d 995 (D. ND. 2012)
  - *Teel v. Chesapeake Appalachia, LLC* , 906 F. Supp. 2d 519 (N.D. W. Va. 2012), *aff'd,* 542 Fed. Appx. 255 (4th Cir. 2013)

Whiteman v. Chesapeake Appalachia, LLC, 729 F.3d 381 (4th Cir. 2013)

- *Background:* Surface owner brought a trespass claim against the owner. Chesapeake, the mineral owner, had obtained pit waste discharge permits from the West Virginia Department of Environmental Protection. As part of the permitting process, Chesapeake notified the Whitemans of its intent to drill and dispose of waste consisting of drill water, frac flow back, and various formation cuttings in on-site waste pits. The Whitemans sued asserting that Chesapeake should have used a closed loop system instead of on-site waste disposal pits. The Whitemans failed to supply evidence of the pits imposing a "substantial burden" on the surface.
- *Holding*: The court found for the defendant stating that, at the time the wells were drilled, the use of waste pits was the common and ordinary method of disposal in West Virginia, was consistent with permitting requirements of the West Virginia Department of Environmental Protection.

Hill. v. Southwestern Energy Co., 2017 U.S. App. LEXIS 8862 (8th Cir. May 22, 2017)

- *Background*: Plaintiffs claimed that hydraulic fracturing waste deposited by Southwestern in an abandoned and plugged well had migrated onto their property. The well SWE drilled—the "Campbell well"—is 180.3 feet from the property line. SWE leased a surface area of 3.29 acres and disposed of approximately 7.6 million barrels of fracking waste. It was shown that if the leased area were 100% porous (which it was not), it would hold just under 1.1 million barrels.
- *Holding*: The trial court abused its discretion and the expert report should not have been excluded - the jury, not the trial court, should be the one to 'decide among the conflicting views of different experts.' " The appellate court also held that it was "a reasonable inference" that the fracking waste may have migrated across the property line.

Tort Case Examples

Tort Cases that have been filed but not tried as of date of this presentation:

- *Pawnee Nation of Oklahoma v. Eagle Road Oil LLC*, Case No. Civ-2017-803 (Dist. Ct. Pawnee Nation)
  - Alleges disposal of wastewater from wells that were hydraulically fractured induced earthquakes and damaged tribal buildings.

Other: Refusal to Conduct Rulemaking

Martinez v. COGCC,
2017 Colo. App. LEXIS 339 (Colo. Ct. App. Mar. 23, 2017)

- Opponents of hydraulic fracturing petitioned the COGCC to promulgate a new rule that would require the COGCC to not issue drilling permits, unless it can be shown to not adversely impact the environment. COGCC denied the petition.
- The decision was appealed to the Denver District Court – which held that the COGCC must balance development of oil and gas with the protection of public, health, safety and welfare and that COGCC's denial was rational.
- The decision was then appealed to the Colorado Court of Appeals – which reversed the decision 2-1.
- The Colorado Attorney General has filed a petition for writ of certiorari with the Colorado Supreme Court on behalf of the COGCC.

Other: Challenges to Rulemaking

Wyoming et al v. US Dep't of the Interior,
136 F.Supp. 1317 (D. Wyo. 2015).

- In 2015, the Bureau of Land Management promulgated a hydraulic fracturing rule applicable to onshore development of federal and Indian lands and minerals.
- District Court: Vacated the BLM rule on the merits, holding that Congress had not delegated the Department of the Interior legal authority to regulate hydraulic fracturing. The BLM had exceeded its authority by regulating hydraulic fracturing and underground injections.
- Currently on appeal to the 10th Circuit.

2017 Hydraulic Fracturing Law & Practice – Lexis Nexis

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Hydraulic Fracturing Law & Practice – Lexis Nexis

Release Date: 11/17

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Thank you!

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