Board of Public Utilities
Cheyenne Water and Sewer Departments

2416 Snyder Ave.
Cheyenne, Wyoming 82001
(307) 637-6460
www.cheyennebopu.org

July 20, 2026

To: Press Release

From: City of Cheyenne Board of Public Utilities

RE: BOPU's responses to frequently asked questions provided by the media and the public to BOPU related to BOPU's Notice of Significant Noncompliance to Goat Systems, LLC.

1) Why was this organism unusual to find in wastewater from a datacenter project?

   a) Standard practice of BOPU Industrial Pretreatment Program (IPP) is to have new industrial users submit an Industrial Wastewater Discharge Survey that describes the quantity and quality of wastewater to be discharged, including any additives or chemicals to be used. The bacteria was not identified on the list of additives to be used during the initial fill and flush process of the datacenter cooling system. In addition, this type of bacteria is known to consume metal, which could accelerate corrosion and negatively affect the integrity and longevity of metallic piping components throughout the datacenter system.

2) How did BOPU trace the source of the bacteria in question?

   a) BOPU staff started investigating industrial users with the potential to have a discharge containing *Cupriavidus gilardii*. Please refer to the released BOPU timeline starting on March 10, 2026, for more details.

3) Did the bacteria interfere with treatment operations because of its biology, concentration, persistence, or another factor?

   a) BOPU's wastewater treatment facility was unable to treat and remove the bacteria from the wastewater stream. As a result, the presence of the bacteria adversely affected BOPU's ability to produce reuse water for irrigation purposes. Due to the limited information available regarding the *Cupriavidus Gialrdii* bacteria and the associated uncertainty surrounding potential public health impacts, BOPU elected to suspend reuse water production out of an abundance of caution. For specific interference to treatment operations, please refer to the released BOPU timeline starting on June 30, 2026.

4) Did the BOPU know how the bacteria entered the datacenter wastewater discharged to the BOPU?

   a) The BOPU does not know how it entered the datacenter's discharge wastewater, only that BOPU identified it in the discharge prior to the BOPU wastewater sewer system.

Board of Public Utilities
Cheyenne Water and Sewer Departments
2416 Snyder Ave.
Cheyenne, Wyoming 82001
(307) 637-6460
www.cheyennebopu.org

5) Is the broader suspension of discharge from the datacenter closed-loop fill and flush process is mainly a technical, regulatory, or precautionary step?

   a) The broader suspension is precautionary to allow the staff time to research these types of discharges and the monitoring needed to prevent an event like this in the future.

6) Does the BOPU suspension of wastewater discharge privileges from the datacenter's closed-loop and fill and flush process apply to all datacenters moving forward? Or does this only apply to the Meta site, specifically?

   a) It applies to all closed-loop cooling systems moving forward until further notice.

7) Because Goat Systems, LLC was found to be in significant noncompliance with the city's industrial pretreatment regulations, it will no longer be paying for sewer utilities. How will the BOPU continue to ensure that its residents are safe from the consequences of datacenters if a datacenter is not connected to its system?

   a) Goat Systems, LLC is allowed to discharge and will pay for domestic sewer (e.g., sinks and toilets) and blowdown water from evaporative cooling. Goat Systems, LLC is no longer allowed to discharge fill and flush and closed-loop water to the BOPU system until further notice. It is standard practice for industrial or hazardous wastewater to be hauled to specialized wastewater treatment plants. BOPU has requested manifests for all wastewater hauled off for disposal. Local, State, and Federal regulations prohibit illegal discharges.

8) Was the BOPU aware of how fill and flush systems work in a closed-loop system?

   a) Yes, the BOPU was aware of the process to fill and flush and conducted an on-site tour of the fill and flush to further understand the process and discharge logistics. The bacteria was not included in the list of additives to be used.

9) Since March, what have other datacenters with closed-loop systems been doing with their wastewater?

   a) Since March, only one additional closed-loop cooling system has been under construction, and its request to discharge to BOPU was denied.

2416 Snyder Ave.
Cheyenne, Wyoming 82001
(307) 637-6460
www.cheyennebopu.org

10) Could Meta form another LLC and have that company hook up to the city sewer?

a) Regardless of name, BOPU will determine a customer's eligibility to discharge to the public wastewater system based on its operational characteristics and wastewater quality.

11) When BOPU staff cleaned the reuse water in Prairie View Pond, where did they dispose of the contaminated reuse water and dirt?

a) Most of the reuse water in Prairie View Pond was treated at the Dry Creek Wastewater Plant. The remaining reuse water was disinfected and no soil was disposed of. Please refer to the released BOPU timeline starting on March 26, 2026, for more details.

12) The BOPU was made aware of this problem in February. Does it follow that the city council and the mayor would also have known about it since February, since the BOPU is under the city umbrella? If they were not aware, why were they not made aware?

a) On March 25, BOPU Water Reclamation Manager notified the BOPU Board members, the City of Cheyenne Mayor, and the City Chief of Staff of the cease of discharge. Please refer to the released BOPU timeline starting on March 25, 2026, for persons and entities notified.

13) Did the incident result in any confirmed illnesses, environmental impacts, or regulatory violations issued to BOPU?

a) The BOPU has no knowledge of confirmed illness, environmental impacts, or regulatory violations issued to the BOPU.

14) How significant was the discharge in terms of volume and duration?

a) A total of 801,475 gallons of wastewater was discharged during January, February, and March. Sampling occurred during this time as required in the temporary authorization to discharge issued by the BOPU. All sample results were within allowable limits for the pre-disclosed additives in the wastewater.

15) What testing and monitoring is BOPU continuing to conduct now that reclaimed water irrigation has resumed?

a) The BOPU will continue to sample the reuse water used for irrigation for the *Cupriavidus gilardii* bacteria.

Board of Public Utilities
Cheyenne Water and Sewer Departments
2416 Snyder Ave.
Cheyenne, Wyoming 82001
(307) 637-6460
www.cheyennebopu.org

16) Were any other entities besides Goat Systems, LLC involved in the discharge process under review?

a) The temporary authorization to discharge through Goat Systems, LLC sanitary sewer system was issued to Fortis Construction, Inc., Goat Systems, LLC's Contractor.

17) How will the new policy on fill-and-flush and closed-loop cooling system discharges affect future datacenter development in Cheyenne?

a) In the design review/approval process prior to construction for the Goat System LLC site, BOPU required that the closed-loop wastewater piping be physically disconnected from the public wastewater sewer system. BOPU enacted this requirement to prevent accidental spills or leaks containing glycol from closed-loop systems from impacting the public wastewater system. BOPU allowed the temporary discharge of fill and flush water based on disclosed additives to be used. Any new datacenter development will be required to haul fill and flush and closed-loop cooling wastewater to industrial treatment facilities until further notice.

18) Does BOPU anticipate additional regulatory changes or guidance for datacenter operators as similar projects continue to expand in the region?

a) The BOPU does not anticipate additional regulatory changes at this time. BOPU continues to monitor industry trends and best practices regarding datacenter operations.

19) Why did BOPU wait so long to notify the public of the presence of bacteria in the sanitary sewer system?

a) BOPU determined there was a low risk to public health, which did not justify a public notification that could result in public panic. As a public agency, BOPU must weigh public safety, impacted area, and level of risk when determining the appropriate nature and extent of public notifications. Please refer to the released BOPU timeline starting March 22, 2026, for the evaluation of potential health risks.

20) Were County or State representatives aware of the contamination? If yes, when? If no, why not?

a) The Wyoming Department of Environmental Quality was notified on February 24, 2026. Cheyenne Laramie County Public Health was notified on June 18, 2026, of the proposed restart of reuse.

2416 Snyder Ave.
Cheyenne, Wyoming 82001
(307) 637-6460
www.cheyennebopu.org

21)Was Cheyenne LEADS aware of the contamination? If yes, when? If no, why not?

a) BOPU did not notify Cheyenne LEADS as they are not a regulatory agency.

22)Who is responsible for regulating the wastewater from datacenters now?

a) BOPU's Industrial Pretreatment Program (IPP) is the control authority for regulating industrial wastewater in the City of Cheyenne service boundary. BOPU IPP is regulated by the Environmental Protection Agency (EPA).

23)What fines and fees were issued to Goat Systems, LLC/Meta?

a) Goat Systems, LLC was issued an administrative fine of $10,000. BOPU will also issue a surcharge to cover costs incurred in the investigation and treatment of the bacteria. The total cost associated with the investigation and treatment has not been determined at this time. Goat Systems, LLC has appealed the violation and requested a hearing.

24)Was this a malicious discharge?

a) The BOPU does not believe this was a malicious discharge.

25)What was involved in the Clean Up/remediation of the contaminant?

a) The BOPU had to disinfect the Prairie View Pond and clean several miles of sewer mains. Please refer to the released BOPU timeline starting on March 25, 2026, for additional details.

26)Was there any public exposure to bacteria?

a) There were two days of irrigation with contaminated reuse water at the Prairie View Golf Course. In discussion with the golf course, no members of the public were present during irrigation periods. Please refer to the released BOPU timeline starting on March 22, 2026, through March 25, 2026, regarding potential public exposure to the bacteria.

2416 Snyder Ave.
Cheyenne, Wyoming 82001
(307) 637-6460
www.cheyennebopu.org

27)What is the BOPU's policy regarding future contaminations similar to this?

a) The BOPU will not accept fill-and-flush water or closed-loop water until further notice. The BOPU IPP monitors industrial wastewater discharges to Cheyenne's sanitary sewer systems.

28)How many times has this type of contamination happened in the last 10 years?

a) This is the only time the BOPU has identified this type of bacteria in our wastewater system. The BOPU has issued six Notices of Significant Noncompliance in the last 10 years. The reasons for prior notices included failure to report, limit violations, and pass-through events.

29)Why was the name of the industrial user omitted from the first press release?

a) The named source of the wastewater contamination was not included in this media release because the investigation was still ongoing. BOPU's standard operating practice is to not publish a customer's name unless a formal enforcement action has been issued.

30)What prompted the media release in the first place?

a) While BOPU internal testing indicated no presence of *Cupriavidus gilardii* in the reuse water supply, confirmation results from the WPHL were not expected to be received ahead of the reuse water system startup. As a precautionary measure, BOPU determined that the potential for low levels of the bacteria in the reuse water sprayed on public areas presented, while slight, a potential risk to public health. BOPU received confirmation of the negative results from WPHL on the day that the reuse system restarted. No contaminated water passed through irrigation pumps at any time following the restart of the reuse water system.

31)How does this affect those downstream of Cheyenne's wastewater/Crow Creek?

a) BOPU's wastewater treatment plants were unable to treat and remove the bacteria from the wastewater stream. Therefore, the effluent discharge to Crow Creek contained the

2416 Snyder Ave.
Cheyenne, Wyoming 82001
(307) 637-6460
www.cheyennebopu.org

bacteria. The initial research completed by BOPU staff identified that the bacteria are naturally occurring in the environment. Crow Creek is classified as 2C water. 2C waters are not known to support game fish and are not used for public or domestic drinking water supplies. In addition, both WWTPs passed both quarters of WET Testing during this time period. WET Testing is used to evaluate the combined toxic effects of all pollutants in a facility's wastewater on aquatic organisms.

32) "In late February 2026, BOPU laboratory staff identified an unusual bacterium during routine wastewater sampling." Can you describe the routine wastewater sampling? How often is wastewater sampled and what for? What did the sampling find?

a) BOPU staff collect fecal coliform samples twice weekly from the wastewater treatment plant effluents. During routine analysis, staff observed white bacteria colonies on the fecal coliform plates in addition to the typical blue fecal coliform colonies. The samples were sent to WPHL for sequencing and identification. The results determined that the organism was *Cupriavidus gilardii*.
b) Generally, BOPU samples on a daily to yearly basis based on discharge permit requirements. Samples are evaluated for total suspended solids (TSS), total dissolved solids (TDS), biological oxygen demand (BOD), chemical oxygen demand (COD), metals, ammonia, nitrate, total nitrogen, total phosphorus, chloride, sulfate, sulfide, cyanide phenolics, ortho-phosphate, volatile acids, alkalinity, pH, temperature, fecal coliforms, E. coli, site specific parameters based on industrial use, and other parameters as needed/requested.