



Board of Public Utilities

Cheyenne Water and Sewer Departments

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

Below is a summary of events associated with the occurrence of *Cupriavidus gilardii*:

Wednesday, September 17, 2025

BOPU staff visited the Meta Cheyenne Datacenter CHY1-2 (owned by Goat Systems, LLC) construction site to learn about the closed-loop cooling system startup fill-and-flush process. During this meeting, BOPU Industrial Pretreatment Program staff educated Fortis Construction and its subcontractors on pretreatment standards and requirements of temporary authorization to discharge, including sampling requirements. BOPU observed the location of the sampling manhole and initially discussed the layout of the fill-and-flush process and design. BOPU also requested a list of chemicals or other additives that would be used during the fill-and-flush process.

Friday, December 12, 2025

BOPU visited the Meta Cheyenne Datacenter CHY1-2 construction site to inspect the layout of the fill-and-flush system and verify accessibility of the sampling manhole. BOPU observed numerous temporary storage tanks that would hold and recirculate the fill-and-flush solution. In addition, BOPU observed the pump and sample collection points to be used during startup and prior to discharge to the sewer collection system. BOPU was satisfied with the layout of the fill-and-flush system.

Wednesday, January 7, 2026

Nalco Water (Fortis Construction subcontractor) provided an email to BOPU with sample results of the water sample collected after "full chemical cleaning of the [closed-loop cooling] system" which was representative of the wastewater to be discharged to the BOPU sewer system. BOPU's review of the results indicated all parameters to be within acceptable limits. The sample results included a laboratory certification statement validating the results.

Thursday, January 15, 2026:

BOPU Lab staff first observed an unknown bacteria with white colonies showing up on petri dishes when analyzing fecal coliforms on Dry Creek Wastewater Treatment Plant and Crow Creek Wastewater Treatment Plant Effluent samples.



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Thursday, February 12, 2026:

BOPU coordinated with and sent samples to the Wyoming Public Health Laboratory to sequence and identify the bacteria.

Monday, February 23, 2026:

Results came back from the Wyoming Public Health Laboratory identifying the white colony bacteria as *Cupriavidus gilardii*.

Tuesday, February 24, 2026

Wyoming Department of Environmental Quality was notified via phone of *Cupriavidus gilardii*. After the phone call, BOPU staff sent a follow-up email summarizing the conversation and internal research data on the characteristics of *Cupriavidus gilardii*.

Tuesday, March 10, 2026

BOPU staff started investigating industrial users with the potential to have a discharge containing *Cupriavidus gilardii*. Meta Cheyenne Datacenter CHY1-2 was identified as a priority to sample because they were the newest industrial user discharging to the BOPU wastewater system. When a new, unknown substance is identified at a wastewater treatment plant (WWTP), it is common practice to first sample the newest dischargers to the system.

Thursday and Friday, March 12 and 13, 2026

As part of this investigation, BOPU was scheduled to collect bacterial samples from the Meta Cheyenne Datacenter CHY1-2 site. Prior to visiting the site, BOPU was notified that all outdoor activities were suspended for safety reasons due to high winds.

Monday, March 16, 2026

The *Cupriavidus gilardii* was discussed at the Monthly Public Board Meeting. At this time, very little was known about the situation, and the discussion was mainly an informational update.



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Tuesday, March 17, 2026:

BOPU was scheduled for a routine Industrial Pretreatment Program sampling on this date at the Black Hills Cheyenne Prairie Generating Station (CPGS). As part of this routine sampling from the CPGS cooling system outfall, additional analysis for the presence of the white colony bacteria was performed.

Additionally, BOPU contacted City Community, Recreation, and Events to inform them of the potential contamination of the reuse water supply.

Wednesday, March 18, 2026:

Samples were collected from the Meta Cheyenne Datacenter CHY1-2 sampling point from the predischage storage tank. The predischage storage tank was not directly connected to the sanitary sewer system.

Black Hills Energy sample results did not show the presence of white colony bacteria.

Thursday, March 19, 2026

Meta Cheyenne Datacenter CHY1-2 sample results showed the presence of white colony bacteria. Meta Cheyenne Datacenter CHY1-2 March 18 samples were sent to the Wyoming Public Health Laboratory for sequencing.

Saturday, March 21, 2026:

BOPU research indicated that a chlorine residual of 2.0 mg/L (milligrams per liter) would effectively treat *Cupriavidus gilardii*. Therefore, BOPU decided to deliver reuse water at 2.2 mg/L of chlorine residual from Crow Creek Wastewater Treatment Plant to Prairie View Pond. As part of the standard startup procedure of the reuse system, BOPU collected a reuse water bacteria sample at Crow Creek Wastewater Treatment Plant.

Prairie View Golf Course was irrigated with reuse water from Prairie View Pond starting in the evening at 8:00 p.m. and ending at 8:00 a.m. the next day (3/22/26). The first tee time was at 9:00 a.m. on March 22, 2026.



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Sunday, March 22, 2026:

Results of the analysis of the reuse water collected at Crow Creek Wastewater Treatment Plant indicated the presence of white bacteria colonies. Based on prior research, BOPU understood that, while extremely rare, there have been documented infections with *Cupriavidus gilardii*, which were pulmonary or respiratory in nature. This suggested that sprayed or aerosolized contaminated water presented a potential risk to public health. At this time, pumps at Crow Creek Wastewater Treatment Plant were shut down, and no additional reuse water was pumped from Crow Creek Wastewater Treatment Plant to Prairie View Pond.

Tuesday, March 24, 2026:

Results from the March 18 samples came back from Wyoming Public Health Laboratory sequencing, indicating that Meta Cheyenne Datacenter CHY1-2 discharge contained *Cupriavidus gilardii*. Fortis Construction Inc. (Goat Systems, LLC's subcontractor) was contacted via phone to cease discharge from the fill and flush process. Via email, the BOPU Water Reclamation Manager notified the Wyoming Department of Environmental Quality and the BOPU Board Management team of the cease of discharge.

Prairie View Golf Course was irrigated from 8:45 a.m. to 11:00 a.m. on 3/24/26 and 8:00 p.m. 3/24/26 to 8:00 a.m. 3/25/26. The water used on the morning of March 24 was part of golf course maintenance activities. The course does not open to the public until maintenance activities are complete. The first tee time on the 24th was at 11:13 a.m., and the first tee time on the 25th was 9:00 a.m. This was the last time any water was delivered from the Prairie View Golf Course Pump Station until April 13, 2026.

Wednesday, March 25, 2026

Fortis Construction Inc. was notified via email to cease discharge. Via email, BOPU Water Reclamation Manager notified the BOPU Board members, City of Cheyenne Mayor, and the City Chief of Staff of the cease of discharge.

Thursday, March 26, 2026:

BOPU staff sampled reuse water from Prairie View Pond for the white bacteria colonies.

BOPU met with Fortis Construction and one of their subcontractors to discuss the cease of discharge notification. Topics of discussion included possible treatment methods to allow



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continued discharge of the fill-and-flush water. At the time, BOPU declined any further industrial discharge.

Friday, March 27, 2026:

Analysis of the March 26 Prairie View Pond sample results indicated the presence of white bacteria colonies.

BOPU disinfected the Prairie View Pond reuse water by the addition of 6 gallons of 12.5% sodium hypochlorite and used an aerator to thoroughly mix the pond. Sodium hypochlorite is a standard disinfection chemical used in the water and wastewater treatment industry.

Sunday, March 29, 2026:

Following the disinfection attempt, BOPU staff resampled the reuse water in Prairie View Pond for the bacteria. The results of this sample did not indicate the presence of white bacteria colonies. This water was not used to irrigate the golf course but instead was held until the pond could be drained.

Monday, March 30, 2026:

Samples were collected from three of the four Microsoft campuses' sewer outfalls for the presence of white bacteria colonies. The fourth campus was not sampled due to lack of sewer flow.

Tuesday, March 31, 2026

Analysis of the Microsoft water sample did not indicate the presence of the white colony bacteria. To have a comparative sequencing result, BOPU staff sent the negative sample from Microsoft to the Wyoming Public Health Laboratory for sequencing. Upon receipt (May 7) and confirmation of negative results, BOPU sent the Wyoming Public Health Laboratory sequencing results to the Wyoming Department of Environmental Quality .

Thursday, April 2 and Friday April 3, 2026

BOPU staff converted reuse customers from a reuse water connection to a potable water connection. None of these customers had begun irrigating with reuse water prior to this date.



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Friday, April 3, 2026

At this time, water supply reservoirs were low and runoff had nearly ended. In an attempt to conserve the potable water supply, BOPU initiated a restart of the reuse system, and reuse water was pumped from Crow Creek Wastewater Treatment Plant to Prairie View Pond at 9:30 a.m. Admittedly, this was a mistake. BOPU staff regrouped and decided the most conservative approach was to not run reuse water through irrigation systems until potential risks were better understood. Pumps from Crow Creek Wastewater Treatment Plant to Prairie View Pond were shut off at 1:17 p.m. No reuse water from this period was sent through irrigation pumps.

The Prairie View Pond was then disinfected with an additional 40 gallons of 12.5% sodium hypochlorite to treat the water sent from the Crow Creek Wastewater Treatment Plant and in preparation to drain the pond back into the sanitary sewer system en route to the Dry Creek Wastewater Treatment Plant.

Monday, April 6, 2026:

Results from March 26 Prairie View Pond samples came back from Wyoming Public Health Laboratory showing the white bacteria colony was not *Cupriavidus gilardii* and was instead *E. coli* (a bacteria known to be in municipal wastewater). Using pumps, BOPU staff began draining the pond back to the Dry Creek Wastewater Treatment Plant.

Wednesday, April 8 through April 14, 2026

BOPU crews jetted and cleaned the sewer mains from the Meta Cheyenne Datacenter CHY1-2 site to Crow Creek Wastewater Treatment Plant, including the Southern Sewer Lift Station to remove the potential for *Cupriavidus gilardii* from growing in the sewer main and the lift station.

Thursday, April 9, 2026

The pumps used to drain the pond were not able to pump the pond completely dry, so BOPU staff disinfected the remaining water with 500 gallons of 12.5% sodium hypochlorite to achieve the needed 2.0 mg/L concentration.



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Friday, April 10, 2026

BOPU staff sampled the Prairie View Pond Pump Station wet well, Prairie View Pond, and the reuse water at Crow Creek Wastewater Treatment Plant for the presence of white bacteria colonies.

Saturday, April 11, 2026

Results from the previous day's samples did not indicate a clear presence of the white bacteria colonies. However, there were unknown specs in the samples that were believed to be sand particles within the collected samples. Out of an abundance of caution, BOPU added an additional 6 gallons of 12.5% sodium hypochlorite to Prairie View Pond and the Prairie View Pond Pump Station wet well.

Sunday, April 12, 2026

The Prairie View Golf Course and reuse customers east of College Ave, along 12th Street, are the only reuse water customers that do not have a separate potable water connection to their irrigation system. Therefore, it can only be irrigated through the Prairie View Pond Pump Station. The reuse customers along 12th Street are serviced through an additional booster station that supplies water to them, and that station was not online until April 22, 2026. So, BOPU determined that potable water would be used to fill Prairie View Pond to irrigate the golf course and customers serviced by the 12th Street booster station.

A potable water connection at the Crow Creek Wastewater Treatment Plant was used to fill the reuse system to be pumped to Prairie View Pond and reuse customers.

Monday, April 13, 2026

BOPU notified City Community Recreation and Events that potable water was delivered to Prairie View Pond and that irrigation could resume.

Prairie View Golf Course resumed irrigation through the Prairie View Pond Pump Station on April 13, 2026.



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Tuesday, April 14, 2026

BOPU collected samples at Prairie View Pond and Crow Creek Wastewater Treatment Plant as part of the standard startup procedure. Results of these samples (4/15/2026) did not indicate the presence of white bacteria colonies.

Additionally, chlorine residual was evaluated due to the quantity of sodium hypochlorite introduced to the pond to ensure that the water did not present a hazard due to high concentrations of chlorine. Chlorine residual testing showed chlorine levels below what is found in drinking water.

Monday, April 20, 2026

The BOPU Public Board Meeting was held. During this public meeting, each BOPU division provides an operational report to the BOPU Board members to inform them of the prior month's activities. The Water Reclamation Division report included written documentation regarding the actions taken regarding the *Cupriavidus gilardii* contamination. Verbal questions from Board members were received and answered by the Water Reclamation Manager.

Thursday, April 23, 2026

To further its understanding, BOPU contacted other wastewater treatment plants and wastewater treatment professionals to ask about their experience or understanding of *Cupriavidus gilardii*. None of the parties contacted were familiar with this particular bacteria.

Friday, April 24, 2026

BOPU attended a meeting with representatives from Fortis Construction, Nalco Water (Fortis subcontractor), and Meta/Goat Systems, LLC. The meeting was held to discuss the ongoing investigation of the *Cupriavidus gilardii* discovered in the BOPU wastewater system. Outcomes of the meeting included a decision to complete side-by-side sampling event with BOPU and Nalco Water and that fill-and-flush water would no longer be received into the BOPU wastewater system until further notice.

Tuesday, April 28, 2026

Side-by-side samples were collected by BOPU and Nalco Water from Meta Cheyenne Datacenter CHY1-2.



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Friday, April 29, 2026

BOPU analysis of April 28 samples did not show the presence of white bacteria colonies. BOPU results were sent to Nalco Water.

Samples collected by Nalco Water were sent to the Wyoming Public Health Laboratory for analysis; BOPU never received the results of this analysis.

Saturday, April 30, 2026:

BOPU sent April 10 samples (pump station wet well, Prairie View Pond, Crow Creek reuse) and March 30 samples (Microsoft) to Wyoming Public Health Laboratory for sequencing.

Results received (5/7/26) from Wyoming Public Health Laboratory showed that the pump station wet well, Prairie View Pond, Crow Creek Wastewater Treatment Plant reuse, and Microsoft samples did not contain the *Cupriavidus gilardii* bacteria. The white specs observed during testing were not *Cupriavidus gilardii* bacteria.

Thursday – Friday, May 7-8, 2026:

To further investigate the extent and source of potential contamination, BOPU staff collected samples from Crow Creek Wastewater Treatment Plant headworks and seven manholes across the BOPU sewer collection system.

Tuesday, May 12, 2026:

BOPU staff sent May 7-8 samples to the Wyoming Public Health Laboratory for sequencing.

Results received from Wyoming Public Health Laboratory (5/14/2026) indicated that all samples were negative for the *Cupriavidus gilardii* bacteria.

Thursday, May 14, 2026

Based on their knowledge of datacenters in Cheyenne, EPA invited BOPU to give a presentation at the Region 8 Pretreatment Association Conference in Estes Park, Colorado. BOPU Engineering Manager and Water Reclamation Manager gave a presentation at the conference about datacenters and their relationship with water and wastewater providers. The



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presentation included a discussion of the unknown bacteria release and other lessons learned regarding datacenter operation.

Friday, May 15-Friday, June 12, 2026:

Since *Cupriavidus gilardii* is a naturally occurring bacteria often found in soils, groundwater, and surface water, BOPU decided to investigate its potential presence in other areas within the BOPU system.

BOPU collected samples from Sloans Lake, Peanut Pond, Kiwanis Lake, Lake Absarraca, Aquatic Center sewer discharge line, raw water supply to water treatment plant, King 2 underground water storage tank, Old North Crow Reservoir, and various locations within the wastewater treatment plants.

Results from these samples indicated the presence of white bacteria colonies in all of the locations except those sampled at the wastewater treatment plants. The number of white bacteria colonies was noticeably lower than that previously observed at the wastewater treatment plants. These results were unexpected due to numerous previous fecal sampling events at these locations that have not previously indicated the presence of any white bacteria colonies. BOPU sent the results to the Wyoming Public Health Laboratory for sequencing, which returned positive for *Cupriavidus gilardii* (6/8/2026).

Following receipt of the positive results, BOPU Management Team immediately met. Cheyenne Laramie County Public Health.

Samples for the raw water and the King 2 storage tank were from a continuous flow faucet into a common lab sink used to evaluate water corrosivity levels (a test that does not require sanitary lab conditions). Additionally, the samples were collected at the Sherard WTP and brought to the Dry Creek Wastewater Treatment Plant laboratory for analysis. BOPU Management Team decided to recollect the samples – a standard practice to confirm any non-conforming sampling result. The King 2 tank sample location was moved to a suitable location (i.e., at a chlorine analyzer that is connected solely and directly to the King 2 tank).

During the analysis of the resampling, several blanks were positive for the white bacteria colonies. A blank is a sample of clean water that is analyzed to provide quality control and identify potential cross-contamination. The positive blank sample led BOPU staff to consider possible sources of cross-contamination. The *Cupriavidus gilardii* is a gram-negative bacteria meaning it readily adheres to surfaces.

BOPU lab staff evaluated analysis procedures and updated cleaning and preparation procedures for analyzing *Cupriavidus gilardii* to reduce cross-contamination. This included a



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full disinfection of the DRY CREEK WASTEWATER TREATMENT PLANT laboratory and replacement of all labware used to perform the analysis. Resamples collected from Sloans Lake and potable water sources, after the disinfection of the lab and implementation of new labware, showed negative results for the white bacteria colonies or *Cupriavidus gilardii*.

Tuesday, May 19, 2026:

Nalco Water requested assistance from the BOPU lab to run bacterial analysis on samples they collected at Crow Creek Wastewater Treatment Plant and dosed with varying concentrations of chlorine to determine if a chlorine dose is capable of treating the bacteria. The results of the chlorine dosing test were not shared with BOPU.

Thursday, June 18, 2026

BOPU met with Cheyenne Laramie County Public Health to discuss the potential health risk associated with the presence of *Cupriavidus gilardii* in the reuse water to be used for irrigation within public spaces. Prior to the meeting, BOPU drafted a media release describing the startup of the reuse system and the potential health risk associated with *Cupriavidus gilardii*.

As Cheyenne Laramie County Public Health is not a regulating authority of BOPU, BOPU had yet to discuss this issue with Cheyenne Laramie County Public Health, so an overview of the situation was given. Additionally, the potential health risks associated with *Cupriavidus gilardii* were discussed. Following this discussion, Cheyenne Laramie County Public Health requested the weekend to review the previously accumulated data and the language in the media release.

BOPU received an email from Cheyenne Laramie County Public Health (6/22/2026) with concurrence on the media release.

Wednesday, June 24, 2026

BOPU and the Wyoming Department of Environmental Quality held a meeting to discuss the reuse startup media release and an update to the most recent activities of the investigation. During the meeting, Department of Environmental Quality staff indicated that they would inform the Department of Environmental Quality Director and the Governor of Wyoming. At the conclusion of the meeting, Department of Environmental Quality staff concurred with the startup of the reuse system with the existing water quality, contingent on approval from the Department of Environmental Quality Director.



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On June 25, 2026, BOPU received a phone call from the Wyoming Department of Environmental Quality giving final clearance of the public notification and subsequent reuse startup.

Thursday, June 25, 2026

BOPU collected samples from Dry Creek Wastewater Treatment Plant effluent and Crow Creek Wastewater Treatment Plant effluent to be analyzed for *Cupriavidus gilardii*.

BOPU analyzed the samples (6/26/2026), and they showed no presence of white bacteria colonies.

Friday, June 26, 2026

BOPU issued a media release titled "Notice Regarding Discharge to Sanitary Sewer System" with anticipated startup of the reuse system on Monday, June 29, 2026, with non-potable signage posted in public areas irrigated with reuse water.

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.

After the issuance of the media release, BOPU received final sample results confirming that no white bacteria colonies or *Cupriavidus gilardii* were present in the water delivered to the reuse system.

Monday, June 29, 2026

The reuse system was restarted, and tertiary treated wastewater (reuse water) was delivered to Prairie View Pond for delivery to public parks and Prairie View Golf Course.

Tuesday, June 30, 2026

BOPU Industrial Pretreatment Program staff met to evaluate the potential for an enforcement action regarding the biological contamination by an industrial user.

The initial step of this process is to determine if an enforcement action is appropriate based on the severity and impact to the operation of the sewer collection system and/or wastewater treatment plant based on City Code 13.20. Based on the significant labor hours and expense



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required to flush the wastewater collection mains, collect and analyze samples, alteration of operation at the WWTPs, disinfection of the reuse system, utilization of potable water for irrigation in lieu of the contaminated reuse water, and the passthrough of the bacteria to Crow Creek and Dry Creek, BOPU Industrial pretreatment program staff determined that an enforcement action was warranted.

The inability of the Crow Creek Wastewater Treatment Plant and the Dry Creek Wastewater Treatment PLANT to effectively treat or remove the *Cupriavidus gilardii* from the wastewater introduced to the facilities and the resulting discharge into the receiving water bodies constitutes a passthrough event. The inability to use the discharge from Crow Creek Wastewater Treatment Plant for tertiary treatment and ultimate use as reuse water supply constitutes interference with the operation of Crow Creek Wastewater Treatment Plant. Based on the passthrough and interference, BOPU Industrial Pretreatment Program staff determined that a Notice of Significant Noncompliance was warranted.

Based on the sample collected on March 18, 2026, the biological contamination was determined to be present at the outfall of Meta Cheyenne Datacenter CHY1-2/Goat Systems, LLC. During the time of discharge, the facility was operating under a temporary authorization to discharge issued to Fortis Construction, Inc. (subcontractor of Goat Systems, LLC). However, Goat Systems, LLC is the owner of the discharging facility, sewer infrastructure, and connection to the public sewer collection system.

Thursday, July 2, 2026

BOPU issued a Notice of Significant Noncompliance to Goat Systems, LLC. Additionally, BOPU issued a media release titled "Public Notice of Industrial User in Significant Non-Compliance with Federal Pretreatment Regulations."

July 8, 2026

Public Notice of Environmental Noncompliance was published in the legal notices section of the Wyoming Tribune Eagle.

July 10, 2026

BOPU received an appeal of the Notice of Significant Noncompliance from Goat Systems, LLC. BOPU cannot provide any additional comments until the appeal process is complete, including a press conference.