

**Comments Concerning
The Upper Green River Basin Permit by Rule for Existing Sources
To
Mr. Steve Dietrich, Administrator
Wyoming Department of Environmental Quality, Air Quality Division
Fax: 307-777-5616**

**From
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In reviewing the proposed Upper Green River Basin Permit by Rule for Existing Sources being developed by the Wyoming Department of Environmental Quality, Air Quality Division, to bring the Basin back into compliance with national ozone standards, Apogee Scientific, Inc. (Apogee) supports the approaches taken in the draft rule. We at Apogee are quite familiar in the efficacy and cost effectiveness of Leak Detection and Repair (LDAR) programs that employ appropriate monitoring techniques for uncontrolled volatile organic compounds (VOCs) being emitted from Oil and Gas wells and PAD facilities.

Apogee is an applied research small business located in neighboring Colorado that has developed the Apogee Leak Detection System (LDS) which is an infrared (IR) instrument for mobile leak detection applications. The system can simultaneously measure methane, total hydrocarbons, and carbon dioxide at sub-part per million (ppm) concentrations in air. The system also incorporates a GPS that allows the survey vehicle track and location of leaks to be recorded. LDS units have been successfully deployed in trucks, ATVs, and helicopters. The LDS is very complementary when coupled with IR gas imaging cameras for the cost-effective locating of fugitive emissions leaks. The LDS excels in quickly identifying the general locations of small to large leaks from downwind distances even well beyond the fence line of wells, processing plants, and compressor stations. This information can then readily assist an IR gas imaging camera operator to pinpoint the exact leaking components.

The Wyoming Department of Environmental Quality, Air Quality Division should also consider taking a state-wide approach in finding and fixing leaks that will lead to the successful controlling of smog-forming VOC from both the existing and anticipated new wells and operations as well as methane emissions from natural gas wells. If you would like to know more about the history and full value of the award-winning Apogee LDS technology and how it plays in meeting the proposed regulation goals, please contact us.