



7547 South Fwy, Houston, TX 77021 | 713-218-0101 | www.rebellionphotonics.com



April 6, 2015

Steve Dietrich
Administrator of the Wyoming Department of Environmental Quality
Air Quality Division
122 West 25th St, Herschler Building
Cheyenne, WY 82002

Comment on proposed changes to the Wyoming Air Quality Standards and Regulations

Rebellion Photonics supports the approach taken in the draft rule regarding changes in regulations on leak detection and repair (LDAR) in the State of Wyoming. (Wyoming department of environmental quality air quality division – nonattainment Area Regulations- Chapter 8).

Rebellion Photonics offers camera technology which is used for safety and emission monitoring in the oil and gas industry. Unlike regular infrared cameras and point detectors, the technology both sees and quantifies gas leaks in real-time. This is a fully automatic system which mitigates the risk of man made errors in the LDAR process. The technology can identify all hydrocarbons, such as methane and other dangerous chemicals such as hydrogen sulfide. This makes the technology suited for monitoring as proposed in the drafted regulations.

Rebellion Photonics is already operating in Colorado which has implemented regulations regarding LDAR. This has been a success and Rebellion Photonics is an Approved Instrument Monitoring Method (AIMM) in the State of Colorado. By implementing instrument based systems, the number of leak alerts can be drastically reduced without big capital expenditures for the companies. For Rebellion Photonics' LDAR service, a truck mounted camera visits the site and all paperwork is included, making it an easy, efficient and cost-effective process for the producers.

Rebellion Photonics wishes to support the increased focus on LDAR and on lowering emission in both Wyoming and nationally, and wishes to work together with the regulators and industry to lower methane and other air pollutants.

Sincerely,

Allison Lami Sawyer
CEO, Rebellion Photonics



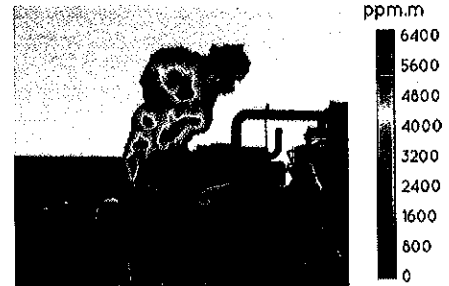
REBELLION PHOTONICS

GAS CLOUD IMAGING (GCI)

The GCI sees and quantifies gas releases in real-time so that you can fix problems before safety issues or environmental incidents occur. Unlike traditional infrared cameras, no additional "sniffers" or point-detectors are needed!

LDAR and Maintenance

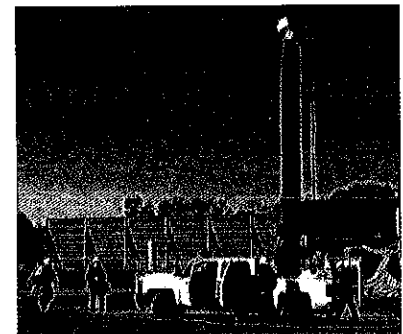
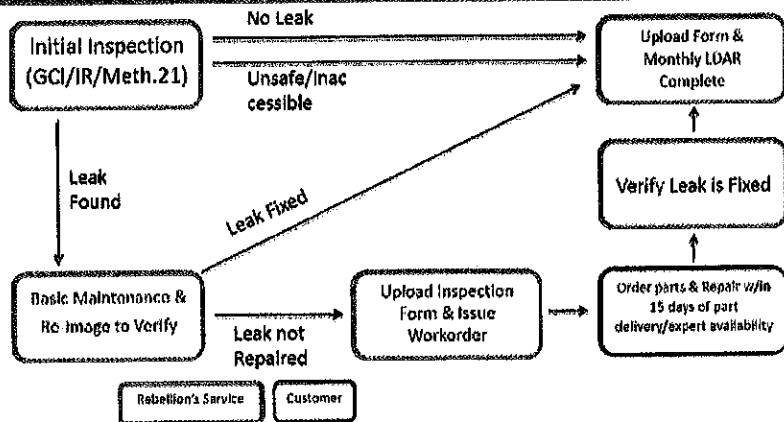
A truck-mounted monthly monitoring service is offered for smaller sites such as well-heads or storage tanks. See just how well your facilities are operating in order to maintain excellence and set goals. Obtain proof that your site is a low emitter. The GCI's real-time volume measurements are accurate to within 10%



Technology GCI

Advanced hyperspectral infrared imaging technology. The camera "sees" potential gas leaks in real-time (15 fps) Unlike IR the GCI is fully automated system that can quantify leaks and differentiate between 20 different gases including all hydrocarbons, such as methane and other dangerous chemicals such as hydrogen sulfide. No interpretation of image needed! More reliable than single point detection sensors. With added benefit of reduced false positives. Operates on 2000 ft radius

LDAR and Maintenance



AS SEEN IN:

THE WALL STREET JOURNAL

Inc.

ENR

Oilfield Services

7547 South Fwy, Houston, TX 77021

www.rebellionphotonics.com

Call for demo!

(713) 218-0101