Green Recursive Utility Service LLC (Nick Cordova)

GENERAL PUBLIC COMMENT — NOT TECHNICAL TESTIMONY

In the Matter of the Application of Yucca Growth Infrastructure, LLC for an Air Quality Permit, No. NSR 10883 — AQB 26-57 (P) (Project Jupiter, Santa Teresa, Doña Ana County)

Submitted by: Green Recursive Utility Service LLC
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This is a general public comment submitted through the Department's public comment portal. Green Recursive Utility Service LLC ("GRUS") is not a party to this proceeding, and this comment is not technical testimony and should not be treated as such.

GRUS is the publisher of GRUS-STD-60084, a measurement standard for data center water and energy consumption, published in the public domain under a CC0 dedication. GRUS submits this comment on one point the air record does not currently reach.

This proceeding will fix the operating envelope of the power source for one of the largest data center campuses ever proposed in New Mexico — a microgrid of roughly 2.46 GW built from thousands of fuel cells, running continuously. The air permit will define how much energy this campus may draw and emit. What no instrument in this record defines is how the campus's water will be measured. Project Jupiter's water consumption — for cooling, for the microgrid, and for the campus as a whole — is the central concern of the host community, yet it stands in this record as applicant estimates, stated without a measurement method: no metering granularity, no separation of water by source and by use, no facility consumption classification, and no verification protocol under which a reported figure can be checked against metered records. An operating envelope fixed on the air side while the water side runs on unmeasured estimates leaves the Department, the county, and the community holding numbers none of them can audit.

A published method for exactly this gap exists and is available to the Department at no cost. GRUS-STD-60084 v2.0-U (Uniform Edition), DOI 10.5281/zenodo.23246001, classifies a facility by measured characteristics, accounts for water granularly by source and by use and for energy separated by function, and carries a verification form (GRUS-AUD) under which reported quantities are checked against metered records. The method has been applied in full to a real facility — the granular consumption audit of the Circle T facility in Texas (GRUS-AUD-CTDC-R1, September 2026), submitted to the City of Keller and the Texas Commission on Environmental Quality and sworn into the record of that proceeding, with third parties standing on it.

GRUS respectfully asks that the Department: (1) place this comment and the standard it identifies in the record of AQB 26-57 (P); (2) require the applicant to state on the record, before a decision, the campus's design and maximum water withdrawal and consumption and its cooling configuration, measured and classified in accordance with GRUS-STD-60084 v2.0-U; and (3) incorporate measurement and public reporting of the facility's water withdrawal and consumption under that standard into any permit condition or recommendation arising from this proceeding, so that the operating envelope this record authorizes is measurable on the water side as it is on the air side.

GRUS-STD-60084 is also of record in Texas PUC Project No. 58317 (Item 96), Ohio PUCO Case No. 24-0508-EL-ATA, Arizona Corporation Commission Docket No. E-01773A-26-0123, and New Jersey BPU Docket No. EO26080463.

The full text of the standard is available at no cost at DOI 10.5281/zenodo.23246001. GRUS will supply printed copies on the Department's request.

Respectfully submitted,
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Green Recursive Utility Service LLC

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