Samuel Chasse

While I support economic development in New Mexico, I object to the fossil-fuel energy infrastructure proposed for Project Jupiter. The permit should be denied or conditioned upon transitioning to 100% renewable energy and closed-loop water infrastructure.

1. Elimination of Methane-Based Fuel Cells and Regulatory Loopholes
The proposed behind-the-meter microgrid relies on 2.45 GW of Bloom Energy fuel cells powered by natural gas (methane). This setup will emit over 10 million metric tons of CO2 annually. Operating behind the meter is a workaround to bypass the public grid and sidestep compliance with New Mexico's Energy Transition Act, which requires public utilities to transition to 100% zero-carbon electricity by 2045.

2. Compliance with State Climate Mandates
Allowing a private microgrid to emit millions of tons of greenhouse gases directly undermines Governor Michelle Lujan Grisham's Executive Order 2019-003, which mandates a statewide emissions reduction of at least 45% by 2030 and net-zero emissions by 2050. This private, off-grid project must not be exempted from the emission mandates that apply to the rest of New Mexico.

3. Transition to 100% Renewables (Solar and Storage)
Project Jupiter should be powered entirely by renewable energy. NMED must require the project to use solar arrays paired with battery energy storage systems (BESS), replicating the clean energy model successfully deployed at Meta's Los Lunas Data Center, which runs on 100% contracted solar and wind resources.

4. Public Health and Air Quality Harms
The proposed microgrid will emit approximately 150 tons of particulate matter (PM2.5 and PM10) and 37 tons of nitrogen oxides (NOx) annually in a region that already struggles with ozone and air quality. These emissions threaten the respiratory and cardiovascular health of local New Mexicans, particularly in vulnerable frontline communities.

5. Mandatory Closed-Loop Water Systems
In an arid, water-stressed desert environment, protecting local aquifers is a priority. NMED must mandate the use of strict, fully closed-loop water systems for all cooling infrastructure to prevent groundwater depletion and protect local water resources.

NMED should deny Permit No. NSR 10883 unless the applicant commits to 100% renewable energy, integrates with a decarbonizing grid to comply with state law, and utilizes closed-loop water cooling systems.

Thank you for your consideration of these comments.