



PO Box 636, Santa Fe, NM 87504

(505) 992-8683

info@cvnm.org

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Submitted Via Email and NMED's Comment Portal

New Mexico Environmental Department  
Air Quality Bureau  
Permits Section  
325 Camino de los Marquez, Suite 1  
Santa Fe, NM 87505

July 6, 2026

Re: Comments on Yucca Growth Infrastructure, LLC-YGI Microgrid Air Quality Construction Permit Application

Dear Air Quality Bureau Permitting Team:

Conservation Voters New Mexico Education Fund submits these comments in response to Yucca Growth Infrastructure, LLC-YGI's microgrid air quality construction permit application. We respectfully urge the Air Quality Bureau to deny the application.

As a statewide non-profit committed to protecting New Mexico's air, land, water, and communities, we are gravely concerned about the volume of emissions that this project will produce and the associated public health, environmental, and climate impacts on communities in Doña Ana County and beyond.

As was publicly reported in Source NM, Yucca Growth's gas powered fuel cell microgrid project is estimated to produce [10 million tons of greenhouse gas emissions](#) per year. This is roughly equivalent to the carbon emissions produced by 2.3 million gasoline-powered passenger vehicles over the course of a year. For comparison, there are approximately [2 million vehicles](#) currently registered in New Mexico. The carbon emissions from Yucca's proposed microgrid exceed the combined emissions from every single registered vehicle in New Mexico over a year.

Emissions on this scale jeopardize the health of communities now and in the future and risk derailing New Mexico's commitment to achieving net zero emissions as enshrined in the 2019 Energy Transition Act. By exacerbating climate change, greenhouse gas emissions threaten the future survival and wellbeing of New Mexicans.

Additionally, New Mexico's climate, landscape, and workforce are well-suited for clean energy production. Clean energy such as solar and wind could greatly reduce the emissions associated with this project and merit consideration as an alternative to a gas and fuel cell powered microgrid.

Finally, we urge the Air Quality Bureau to consider equity and justice in the evaluation of the permit application. A project of this scale must center community input in the permit evaluation process, particularly input from marginalized and frontline communities who will be most directly impacted by this project in Doña Ana county.

### **Conclusion**

Conservation Voters New Mexico Education Fund urges the Air Quality Bureau to deny Yucca Growth Infrastructure's permit application due to the high volume of emissions which will contribute to negative health, environmental, and community impacts and conflict with New Mexico's climate goal of zero emissions.

Respectfully,

Rach Arrey  
Climate & Energy Advocate  
Conservation Voters New Mexico Education Fund