

Samantha Colt

Dear NMED staff,

My name is Samantha Colt. I live in Farmington and I am writing because I am concerned about the risks and harms Project Jupiter poses to New Mexicans. I am submitting this comment to urge the New Mexico Environment Department to reject Yucca Growth Infrastructure, LLC's air permit application for the YGI Microgrid in Doña Ana County.

I share many concerns with others. For one, through my work as a civil servant for the United States government I have seen first hand how drought has affected the southwestern states. It is a fact that these centers use a substantial amount of water at a rate in which it cannot be replaced. Other environmental concerns involve the amount of power used. The proposed "micro" grid has a 2,462 MW Capacity. For comparison, the El Paso Electric grid is about 2,900 megawatts (which services NM's second largest city, Las Cruces) and the entire PNM grid is about 2,700 megawatts. Each of those grids include a substantial amount of renewable energy sources and each of those grids has lower total greenhouse gas pollution than just Project Jupiter's proposed power plant. Additionally, Project Jupiter's power plant will release up to 10 million tons of climate-warming greenhouse gasses every year. This would make a mockery of NM's climate goals, and erase most of the climate progress we have made in the last two decades. This is more greenhouse gas pollution than New Mexico's three largest cities combined – Albuquerque, Las Cruces, and Santa Fe.

Additional concerns regarding Project Jupiter include the fact that Santa Teresa Elementary and High School are located within five miles of this project site. 96% of students at the high school are hispanic. There are also day care centers located within miles of this site. This is an environmental injustice to these children who are especially vulnerable to the health impacts of NOX, CO, and VOCs. This contamination is a result of the fuel cells that generate hazardous waste. Fuel cells filter out sulfur and other contaminants in the methane stream. These contaminants accumulate as hazardous waste in "desulf canisters." The power plant will be generating enormous amounts of hazardous waste. Jupiter claims that any pollution from opening and changing the filter media in the desulf canisters is exempt from air permitting regulations (because there is less than 1000 lbs/yr).

NMED's mission is "to protect and restore the environment and to foster a healthy and prosperous New Mexico for present and future generations." Granting these permit applications is a direct contradiction to that mission.

The project's proposed fuel cell powered grid is concerning for many reasons:

- * It would still produce a high level of greenhouse gas and toxic pollutants.
- * This technology generates toxic waste, and the process for handling this waste is still unclear.
- * Fuel cell technology or a centralized waste system has never been tried at this scale.
- * Surrounding communities' air will be severely impacted by this development.

I urge the NMED to reject YUCCA Yucca Growth Infrastructure, LLC's air permit application for the YGI Microgrid. I ask the department to please hold a bilingual public hearing near the Santa Teresa community, so that residents can learn about the risks associated with fuel cell technology.