

Azriela Thom

I am a New Mexico resident and I am writing because I am concerned about the risks and harm that Project Jupiter will pose for New Mexicans. I urge the NMED to deny Air Quality Construction Permit Application 10883 for the Yucca Growth Infrastructure (YGI) Microgrid in southern Dona Ana County. Granting a permit to emit over 10 million metric tons of CO₂ annually violates NMED's mission to protect public health and prevent air quality deterioration, disproportionately harming BIPOC and low-income communities.

I am a young adult and the building of this data center here has the potential to affect me and my loved ones for decades. AI is not a necessity, so why are we wasting our water, clean air, environment, and quality of life on a data center to keep it going? I fear for the kind of life, or lack thereof, we will have to face if this data center is built. We only get one Earth, and if we continue to treat it in this way, it will no longer be able to sustain us. Where does it stop? This data center? The next one? Our resources are not infinite, and while we are still facing issues with the climate crisis, deforestation, poverty, world hunger, a lack of clean water for all, and so much more it would be remiss to toss in another issue for us to eventually deal with. Instead of thinking about the money this might bring us, we must think about the lasting affects this data center will have on our state and its people.

The application relies on an unproven, unregulatable, and inadequately tested design:

- Unprecedented, Unproven Scale: YGI proposes using 2,275 Bloom Energy Solid Oxide Fuel Cells (SOFC). Though several projects have been announced with much fanfare, the largest operating Bloom installation is a 40 MW facility - 60 times smaller than what is proposed here. Scaling this technology to a mega-utility application remains entirely unproven.
- Suspect Estimates & Inadequate Testing: The emissions data provided is based on testing of a single, 65 kW unit four times for four hours. Extrapolating data from a unit 37,876 times smaller than the proposed plant capacity - and adjusting it with an arbitrary 15% safety margin - fails to provide credible empirical evidence. The emissions data provided by the company cannot be trusted.
- Enforcement Impossibility: The design routes 2,275 individual cells through separate stacks with no add-on pollution control mechanisms or integrated continuous monitoring for particulate matter, VOCs, or shifting CO₂ intensity. NMED cannot practically enforce compliance under 20.2.72.210 NMAC across thousands of individual, degrading units.
- Severe Public Health & Environmental Impacts: The microgrid will emit 161.2 tons/year of CO and 124 tons/year of VOCs near existing EPA non-attainment zones. It will generate a thermal plume and a "heat island" effect, raising downwind temperatures by up to 3.6 degrees Fahrenheit in a sweltering desert climate, threatening vulnerable populations.

Furthermore, concentrating 10M metric tons of climate-warming CO₂ into 275 acres - exceeding the combined emissions of Albuquerque, Santa Fe, and Las Cruces - creates localized health risks. Emerging 2025-2026 research links elevated CO₂ levels to permanent changes in human blood chemistry, oxidative stress, and cognitive decline. Because CO₂ sensitivity exists on a normal spectrum, even minor baseline increases can induce anxiety and panic attacks in sensitive individuals. YGI must not be allowed to greenwash a fossil-fueled plant that erases New Mexico's climate progress. I urge the NMED to outright reject Yucca Growth Infrastructure, LLC's air permit application for the YGI Microgrid. I implore the department to hold a bilingual public hearing near

the Santa Teresa community, so that residents can learn about the risks associated with fuel cell technology and to investigate these severe community impacts.