Sarah McArthur

To the New Mexico Environment Department, Air Quality Bureau:

Thank you for the opportunity to comment on the Yucca Growth Infrastructure (YGI) Microgrid Air Quality Construction Permit Application in Doña Ana County. I am submitting this comment as a New Mexico resident concerned about the regional environmental and public-health impacts of this project. Although I do not reside in Doña Ana County, the scale of this microgrid and its associated emissions, water use, and infrastructure clearly extend beyond county boundaries and affect statewide resources.

1. The emissions profile of this microgrid is not adequately disclosed.
The permit application does not provide sufficient detail about the number, size, or operational schedule of the natural-gas engines and turbines proposed. A microgrid of this magnitude—designed to power a hyperscale data center—will operate at near-continuous load. Without transparent modeling of NOx, VOCs, CO, PM2.5, and greenhouse gas emissions under realistic operating conditions, the public cannot meaningfully evaluate the air-quality impacts.

2. The cumulative impacts of this project have not been assessed.
This microgrid is part of a larger industrial development (Project Jupiter) that includes massive energy demand, water consumption, and pipeline infrastructure. Evaluating the microgrid in isolation ignores the cumulative emissions from construction, pipeline compression, increased truck traffic, and associated industrial activity. NMED should require a cumulative impact analysis before issuing any permit.

3. The project's water use raises serious environmental concerns.
Public reporting indicates that the microgrid's cooling systems may require nearly one million gallons of water per day, in addition to the initial two-million-gallon fill. This is a significant burden on the Lower Rio Grande Basin, which is already over-allocated and under severe hydrological stress. Air-quality permitting cannot be separated from water-resource impacts when evaporative cooling and blowdown directly affect emissions and particulate formation.

4. The microgrid depends on infrastructure currently under legal challenge.
The Green Chile pipeline and related natural-gas infrastructure have been challenged for attempting to bypass environmental review. Approving an air-quality permit for a facility that depends on contested, incomplete, or unpermitted infrastructure exposes the state to long-term risk and undermines public trust.

5. The economic claims associated with this project require independent verification.
Hyperscale data centers often underdeliver on job creation while over-consuming public resources. Before issuing an air-quality permit, NMED should require a third-party analysis of long-term emissions, energy demand, and public-resource impacts, including decommissioning obligations.

For these reasons, I urge NMED to pause this permit, require full disclosure of emissions and operational data, conduct a cumulative impact analysis, and ensure that all associated infrastructure has undergone proper environmental review before any approval is granted.

Respectfully submitted,
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