

William Unknown

I strongly urge the NMED to deny Air Quality Construction Permit Application 10883 for the Yucca Growth Infrastructure (YGI) Microgrid in southern Doña Ana County. The technology involved in this permit is untested at this scale, produces large quantities of hazardous, cancerous benzene, and the company providing the technology, Bloom Energy, does not have a history of credibility. This 'microgrid' would produce as much electricity as Albuquerque and Las Cruces combined, and completely undermine our efforts for sustainable green energy. as well as posing serious risks to air quality with untested technology

This fuel cell technology has never been used at this scale, and emissions 'data' is based on a single unit running for a short time. This project would use thousands of these fuel cells continuously for months on end, with no emissions monitoring of each cell. This is equivalent of plugging it in and hoping that it's working, and NMED cannot and should not approve an application that relies on wishful thinking.

These fuel cells aggregate the low levels of hazardous benzene natural gas, and once collected, those high concentrations of benzene need to be disposed of. Bloom has been involved in at least one lawsuit related to illegal dumping of the benzene their fuel cells produce, and they frequently misrepresent the facts related to their fuel cells in terms of performance, efficiency, reliability, and hazardous waste.

It would be well worth NMED's time to review Hindenburg Research's 2019 report on Bloom Energy and investigating their claims before approving this permit.

<https://hindenburesearch.com/bloom-energy-a-clean-energy-darling-wilting-to-its-demise/>

This is being presented as 'green power', but only in comparison to worst case grid efficiency. There's no mention and no effort towards using solar-wind-battery combinations, which would actually be renewable and have more environmental impact, yet solar-wind-battery generation has been used successfully in other data centers.

This permit application ****needs**** to be rejected. At a minimum a successful permit must include actual monitoring of emissions (particularly for an untested technology such as Blooms fuel cells), a clear and transparent disclosure of hazardous waste and disposal, and efficiency projections based on robust data. This application has none of these features, and poses a risk to the health and well being of my family and my young daughter.

I also feel the public needs an additional 60 days to review the application and submit comments, the timeline has not been sufficient for public review and scrutiny.