

Aoife Drew

Dear NMED staff, My name is Aoife Drew, 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. The project's proposed fuel cell powered grid is concerning for many reasons:

- 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.
- This is more greenhouse gas pollution than New Mexico's three largest cities combined – Albuquerque, Las Cruces, and Santa Fe.
- 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.
- Fuel cell technology has not been deployed at this scale. This is 1000 times larger than the largest existing Bloom fuel cell installation.
- The Application is based on pollution testing from a very small unit. The testing unit is only 65kw, while the power plant is 37,000 times that size.
- Fuel cells 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. I urge the NMED to outright reject YUCCA Yucca Growth Infrastructure, LLC's air permit application for the YGI Microgrid. If NMED does not reject the permit, I ask the department to please hold a bilingual hybrid public hearing near the Santa Teresa community, so that residents can learn about the risks associated with fuel cell technology. NMED should give the public 60 days of additional time to review and comment on the Application to ensure everyone can meaningfully comment and participate. Sincerely, Aoife Drew