

# Holly Miles

I am writing to formally express my strong technical and environmental concerns regarding Permit Application No. 10883 submitted by Yucca Growth Infrastructure, LLC for the YGI Microgrid facility in Santa Teresa, New Mexico.

## 1. Cumulative Air Quality and Airshed Modeling Impacts

The New Mexico Environment Department must require rigorous, comprehensive modeling of the cumulative air impacts of Nitrogen Oxides ( $\text{NO}_x$ ), Carbon Monoxide (CO), and Fine Particulate Matter ( $\text{PM}_{2.5}$ ). The proposed microgrid is located in close proximity to residential areas and schools in Santa Teresa. Because this facility sits within the interconnected El Paso-Juárez-Las Cruces air basin—which routinely experiences critical air quality challenges—the addition of massive localized emissions poses an immediate risk of pushing the regional airshed out of federal ozone compliance.

## 2. Enforcement and Operational Thresholds

Independent reviews and community advocates have raised serious red flags regarding the tight emission margins calculated by the applicant. Operating a massive power-generation asset just fractions under major regulatory source thresholds leaves no margin for error. NMED must thoroughly audit these assumptions to ensure the emission levels are practically enforceable and do not bypass more stringent federal Title V permitting standards.<sup>3</sup> Formal Request for a Public Hearing Pursuant to New Mexico administrative codes and environmental justice principles, I hereby formally request that NMED hold a public hearing on Permit Application No. 10883. Given the historic scale of the associated data center development, the high volume of projected greenhouse gas and criteria pollutant emissions, and the significant community interest, a public hearing is necessary. This process must allow community members to cross-examine technical data and voice their concerns on the record. Furthermore, I request that NMED provide all future public notices, hearing details, and translated permit documentation in both English and Spanish to ensure meaningful access for all affected residents in Doña Ana County. Thank you for your careful consideration of these comments and for protecting the public health and environment of southern New Mexico