

Cameron Murphy

New Mexico Environment Department Air Quality Bureau – Permitting Section
Re: Yucca Growth Infrastructure, LLC (YGI) Microgrid Air Quality Construction Permit
Application

I am submitting this comment as a New Mexico resident in opposition to the air quality construction permit application filed by Yucca Growth Infrastructure, LLC to power the Project Jupiter data center campus in Doña Ana County.

This application replaces YGI's prior proposal for gas-fired turbines with solid oxide fuel cells. While the fuel cell proposal is projected to reduce emissions from the original plan's roughly 14 million tons of greenhouse gases per year, the revised figure of approximately 10.1 million tons annually still exceeds the combined greenhouse gas emissions of Albuquerque, Las Cruces, and Santa Fe. This is not a solution to the project's climate impact. It is a smaller version of the same problem.

The fuel cell technology proposed here is commercially established at smaller scale, but this project would deploy it at 2.45 gigawatts, a scale with no precedent anywhere in the world. NMED should not treat manufacturer claims about performance at this unprecedented scale as a substitute for independently verified data.

While water discharge falls outside the Air Quality Bureau's authority, NMED as an agency should take note of a directly relevant precedent. Earlier this year, Cheyenne, Wyoming's Board of Public Utilities suspended acceptance of industrial wastewater from a Meta data center campus after a rare bacterium, traced to the facility's closed-loop server cooling fill-and-flush process, disrupted two municipal water reclamation plants and forced the reuse system offline for months. Bloom Energy's fuel cells do not require water for cooling, but the data center's own server infrastructure will, regardless of how its electricity is generated. I ask that NMED's Ground Water Quality Bureau be made aware of this application and the Cheyenne precedent, and that the department coordinate internally to ensure this risk is assessed before construction, not after a comparable incident occurs in Doña Ana County.

Doña Ana County already carries a disproportionate share of New Mexico's air pollution burden. The area around this project fails to meet federal air quality standards, and residents in Sunland Park and Santa Teresa already live with the health consequences of nearby extractive and industrial activity. Adding a facility of this scale to that same airshed, without a full environmental review, compounds an existing injustice rather than correcting it.

I ask NMED to:

1. Deny this permit application as submitted.
2. Require a full Title V major source review rather than treating this as a synthetic minor source.
3. Hold a public hearing in Doña Ana County, conducted bilingually, before any final decision is made.
4. Ensure NMED's Ground Water Quality Bureau reviews the data center's server cooling and wastewater plans in light of the Cheyenne precedent, independent of this air permit decision.

5.

New Mexico's climate commitments mean nothing if the state's largest new source of greenhouse gas pollution is approved without full scrutiny.

Thank you for your consideration.