

William Hutson

Yucca Growth Infrastructure is proposing a 2.46 GW gas-powered fuel cell plant—nearly double the total fuel cell capacity Bloom Energy has installed across more than 1,000 sites worldwide. It would also be more than 30 times larger than the largest operating fuel cell plant anywhere in the world. A project of this size has no real-world precedent, and there is no reliable way to predict its actual emissions or operational impacts. That uncertainty alone should require far greater scrutiny.

The emissions estimates submitted by the applicant are based on just three four-hour tests of a single 65 kW unit. Those results are being used to estimate emissions for a facility roughly 37,000 times larger, operating continuously in Southern New Mexico's extreme desert conditions. That is not a sufficient scientific basis for approving a project of this magnitude.

The applicant also added a 15% "safety margin" to its emissions estimates, which raises questions about confidence in the underlying data. Even small errors become significant when multiplied across tens of thousands of fuel cells. The public deserves accurate, enforceable data—not assumptions.

There are also unanswered questions about equipment failures, aging systems, and emergency response. This facility would rely on large volumes of high-pressure hydrogen and natural gas, and the risks associated with a project of this unprecedented size have not been adequately demonstrated or addressed.

For these reasons, I urge the committee to deny these permits. At a minimum, any further consideration should include a public hearing in Santa Teresa and a thorough, transparent review supported by reliable data rather than speculative estimates.