

Josh Pitcock



July 2, 2026

New Mexico Environment Department
c/o New Mexico Environmental Department
1190 St. Francis Drive, Suite N4050
Santa Fe, NM 87505

RE: Oracle Comments Urging Approval of Updated Air Permit Application for Project Jupiter

Members of the Board:

As the proud tenant of Project Jupiter's southern New Mexico AI data center campus, Oracle submits these comments in support of the updated air permit application pending before the New Mexico Environment Department.

Project Jupiter represents a major investment in Doña Ana County and New Mexico, including jobs, new public revenue, and significant community investment. The project will also support the AI infrastructure needed to help the United States remain at the forefront of innovation while delivering benefits to the local community where the campus will operate.

Since Oracle submitted comments during the prior public comment period, Project Jupiter's energy plan has changed significantly. The project [will now use Bloom Energy fuel cells](#) to power the AI data center campus, replacing the previously proposed gas turbines and diesel generators with a lower-impact fuel cell microgrid. This updated energy approach is designed to support reliable operations while materially reducing regulated emissions and [significantly lowering ongoing water demand](#) compared with the prior combustion-based plan.

Compared with the air permit application submitted in January, the updated plan is expected to reduce nitrogen oxide emissions by approximately 92 percent, carbon monoxide by 67 percent, volatile organic compounds by 38 percent, particulate matter by 83 percent, and carbon dioxide by 21 percent. These are meaningful reductions that directly respond to concerns raised by residents and local leaders about air quality and the project's environmental footprint.

Bloom Energy fuel cells [generate electricity](#) through an electrochemical process rather than combustion at the point where electricity is produced. The system will use natural gas today because it is available and reliable at the scale required for this project, while materially reducing regulated local air pollutants compared with the prior combustion-based generation plan. The updated fuel cell design also provides more options to reduce emissions further over time because Bloom Energy fuel cells can operate on lower-carbon fuels, including hydrogen or biogas, once these fuel sources become commercially available and operationally viable at the scale the campus requires. Oracle will continue



evaluating those opportunities as the project moves forward, in support of New Mexico's energy goals and Oracle's own sustainability commitments.

Protecting New Mexico's water is also a top priority. Project Jupiter's updated plan substantially reduces the water needed to operate the project's energy and cooling systems. Bloom Energy fuel cells require a one-time startup fill and limited water maintenance, but they do not require continuous water use during normal operations. To cool the racks inside the data center, Oracle will use [direct-to-chip, closed-loop, non-evaporative cooling systems](#). In a closed-loop system, the cooling liquid stays within sealed pipes and is repeatedly reused. Neither the data center cooling systems nor the Bloom Energy fuel cells will use the Camino Real Regional Utility Authority's public drinking-water supply. Instead, the project expects to use non-potable well water from an existing New Mexico rights holder for cooling-system and fuel-cell needs. The use of public drinking water will be no different from any other office building. It will be used in kitchens and restrooms and will remain subject to the project's applicable commitments and limits.

To protect ratepayers, Oracle has committed to pay for all energy costs at Project Jupiter and our other new AI data centers, maintaining energy reliability and ensuring these costs are not passed on to ratepayers. Oracle will fully fund the energy infrastructure and electricity costs associated with the project.

In addition, Project Jupiter will deliver lasting economic benefits to Doña Ana County and New Mexico, creating approximately 4,000 construction jobs, many of which will be filled by local unions. After completion, we anticipate 1,500 ongoing project-supported jobs. The AI data center in Doña Ana County will require a dedicated team to run and maintain the facility, including electrical, mechanical, server, and network systems. We will prioritize hiring local suppliers, vendors, contractors, and residents for these good-paying jobs.

In addition to jobs, we look forward to the economic benefits the data center will bring to Doña Ana County. During construction, the project is estimated to boost Doña Ana County's economy by \$384 million per year. Once operational, it is expected to generate an estimated \$113 million per year in direct economic output. Additionally, our investments include \$360 million in direct payments to Doña Ana County for schools, infrastructure, and local services, plus \$50 million to repair, upgrade, and improve local water systems, boosting reliability and water quality. The project is also expected to provide more than \$6.9 million in additional community investments, including establishing a local workforce development education fund.

Project Jupiter represents a transformative investment in New Mexico and Doña Ana County. The updated air permit application reflects a materially improved energy approach that reduces regulated emissions compared with the prior combustion-based design, lowers ongoing water demand, protects ratepayers, and preserves the project's substantial economic and community benefits. NMED's air permit will set clear, enforceable requirements that protect air quality through proven controls and monitoring.



Oracle respectfully requests NMED approve Project Jupiter's updated air permit application and allow this project to move forward with strong, accountable safeguards in place.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Josh Pitcock".

Josh Pitcock
Senior Vice President, Government Affairs
Oracle Corporation