

Anonymous Anonymous

Dear NMED staff, 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. CLIMATE CONCERNS Project Jupiter's power plant will release up to 10 million tons of climate-warming greenhouse gasses every year. This would make a mockery of NM's climate goals, and erase most of the climate progress we have made in the last two decades. This is more greenhouse gas pollution than New Mexico's three largest cities combined – Albuquerque, Las Cruces, and Santa Fe. 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.

ENVIRONMENTAL JUSTICE 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. The Chihuahuan Desert borderlands are not a barren dump site for Bloom Technologies to test their experimental technologies. Santa Teresa should not serve as ground zero for Bloom Technologies to scale their toxic technologies. Tribal governments like Tortugas Pueblo, Ysleta del Sur, and Pueblo communities with landholdings in Doña Ana county near the site have not been properly notified of this air permit application request. FUEL CELL TECHNOLOGY IS UNCERTAIN Fuel cell technology has not been deployed at this scale.

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. TOXIC WASTE 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). Bloom was fined for improper hazardous waste handling in Pennsylvania and Maryland. In 2020, Bloom was fined \$210,000, and then \$1,161,000. GOVERNANCE 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. NMED should not overlook the overwhelming community concern expressed in the last public comment period, which still applies to this same project. The project's proposed fuel cell powered grid is concerning for many reasons: It would still produce a high level of greenhouse gas and toxic pollutants This technology generates toxic waste, and the process for handling this waste is still unclear. Fuel cell technology or a centralized waste system has never occurred at this scale. Surrounding communities' air will be negatively impacted by this development. I urge the NMED to outright reject YUCCA Yucca Growth Infrastructure, LLC's air permit application for the YGI Microgrid. I ask the department to please hold a bilingual public hearing near the Santa Teresa community, so that residents can learn about the risks associated with fuel cell technology. Sincerely