

Michelle Verranault

I respectfully request that the New Mexico Environment Department deny, or at minimum defer approval of, the Yucca Growth Infrastructure, LLC (YGI) Microgrid Air Quality Construction Permit until the applicant has fully demonstrated compliance with all applicable air quality and environmental requirements. The administrative record should clearly establish that the project will comply with all state and federal air quality standards, including a thorough analysis of emissions from all proposed equipment, cumulative impacts with existing industrial sources in the Santa Teresa area and the effectiveness of proposed emission controls. Because the region already experiences significant air quality challenges, the Department should ensure that any assumptions used in emissions estimates and air dispersion modeling are fully supported, transparent and subject to public review.

In addition, the Department should carefully evaluate whether the project's environmental impacts have been adequately considered, including the availability of water resources needed to support construction and operation in an area where groundwater supplies are limited.

If the project relies on technology that has not been widely proven at this scale, the applicant should provide evidence from actual operating projects, not just projections, that its emission estimates and pollution controls will perform as claimed.

If there is still uncertainty about emissions or how the project will actually perform, the Department should require additional analysis before making a final decision. The applicant should be required to show, with credible supporting evidence, that the project can meet New Mexico's air quality standards in addition to show there will be no impact on the limited groundwater supply before any permit is issued.

If the applicant is unable to make these demonstrations, the Department should deny the permit to fulfill its RESPONSIBILITY TO PROTECT New Mexico's residents, natural resources, and air quality from risks that have not been adequately evaluated.