ORACLE

March 2, 2026

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

RE: Oracle Comments Urging Approval of Air Permits for Project Jupiter (Acoma, LLC)

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 Doña Ana County East and West Microgrid air permits pending before the New Mexico Environment Department (NMED). If approved, the permits will allow Project Jupiter to build and operate behind-the-meter, natural gas-powered microgrids that will provide electricity to the campus independently of the local grid, ensuring there is no impact on residents' electricity bills. 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 understands that New Mexicans have questions about how the microgrids will operate and how we intend to meet New Mexico's 2045 net zero goals. Following are initiatives that we believe reflect a comprehensive approach to an emissions reduction plan for the project.

First, it's important to note that the microgrids will ramp in capacity as the data center facilities are constructed, which will result in a phased emissions timetable. This means that emissions will not reach the expected levels outlined in the application until all buildings are complete, which is projected to be 18 months from the completion of the first building.

Second, even when all buildings are complete, we expect power utilization and CO2 emissions to be lower than the conservative estimates in the application. Project Jupiter is built for energy efficiency. The microgrids will use advanced emissions controls and will be subject to continuous emissions monitoring to meet or exceed state and federal air quality standards. The permit application, and the subsequent modelling, includes peak power-demand assumptions, based on continuous operation at a high utilization. As is typical in a permit application, we must plan for the highest utilization possible on the hottest time and day of the year to ensure we stay within permit limits under all worst-case scenarios. However, because temperatures fluctuate throughout the year, we expect *actual* annual utilization and therefore *actual* annual emissions to be lower. In fact, our data centers rarely require the cooling elements to run at 100% capacity. This is known as the Power Usage Effectiveness (PUE) ratio, which is an indicator of how efficient the cooling elements in the data center are, and how much power it actually utilizes at any point in time. Just as power and cooling usage in a home varies over time, the PUE of the data center, and subsequently, the utilization of the power plant will typically operate at less

than design load capability, depending on the time of day and season of the year. Lower power utilization means lower emissions on an annualized basis.

Third, from our work in Doña Ana County to our global corporate sustainability initiatives, Oracle supports the planet and the local communities where we operate. As the project moves forward, and in support of New Mexico's 2045 net-zero goals and Oracle's own sustainability commitments, Oracle will integrate renewable, carbon-free energy, such as solar and/or fuel cells, into the existing microgrid during that same timeframe. Oracle already has plans to integrate solar power and/or fuel cells into the project by the end of 2029. Because supporting AI workloads requires highly resilient and consistent power infrastructure, the makeup of these carbon free energy sources may include solar, wind, fuel cells, or geothermal.

Finally, in addition to integrating renewables onsite, Oracle will fund emissions reductions projects, with the goal of funding projects that realize at least 100 tons of permanent NOx emissions reductions in New Mexico or the regional airshed where the microgrids are located. We have already identified opportunities that will enable this NOx reduction and are actively planning with key partners on the necessary investments to move toward project execution. We are also evaluating additional initiatives such as orphaned oil and gas well-capping and electrification of transit buses in the region to support incremental emission reductions in the community and state. Our employees will live and work in this community as well, and we want to ensure they and their families have a safe and healthy place to thrive.

Beyond our emissions reduction plan, we are committed to enriching the Doña Ana County community and respecting the natural environment.

Water is a key priority. Our Project Jupiter AI data center in Doña Ana County uses a one-time fill, closed-loop, non-evaporative liquid cooling system that significantly reduces water consumption and does not draw from the local drinking water system.

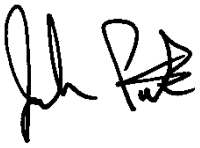
In addition, Project Jupiter will deliver lasting economic benefits to Doña Ana County and New Mexico, creating approximately 4,000 construction jobs, many of which will be filled by local unions. After completion, we anticipate up to 1,500 ongoing jobs onsite or in the community. Some statements suggest that data centers do not require many ongoing jobs. But AI data centers necessitate resources significantly greater in scale than traditional public cloud data centers. 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, including jobs, new public revenue, and significant community investment. NMED's air permits will set clear, enforceable requirements that protect air quality through proven controls and monitoring. Oracle respectfully requests NMED approve Project Jupiter's air permits and allow this project to move forward with strong, accountable safeguards in place.

Thank you for your consideration.

Sincerely,



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