

**STATE OF NEW MEXICO
BEFORE THE SECRETARY OF THE ENVIRONMENT**

**IN THE MATTER OF:
THE APPLICATION
OF YUCCA GROWTH
INFRASTRUCTURE, LLC
FOR AN AIR QUALITY PERMIT
NO. 10883**

RECEIVED

Luis Lopez
By The Office Of The Secretary at 4:38 pm, Jul 28, 2026

AQB 26-57(P)

**APPLICANT YUCCA GROWTH INFRASTRUCTURE, LLC'S NOTICE TO
RESPOND TO MOTIONS FOR DISCOVERY**

Applicant Yucca Growth Infrastructure, LLC ("YGI" or "Applicant"), by and through counsel, hereby acknowledges receipt of multiple Requests for Hearing Officer to Order Discovery filed on July 24th and July 27th. To facilitate orderly consideration of the matters raised, Applicant provides notice that it will submit its position on the Requests for Hearing Officer to Order Discovery by the end of business on Thursday, July 30, 2026, so that the Hearing Officer may consider Applicant's position prior to ruling on the Requests for Hearing Officer to Order Discovery.

Respectfully submitted,

/s/ Carlos Romo

Jennifer Biever, Director

Carlos Romo, Director

Williams Weese Pepple and Ferguson

1801 California Street, Suite 3400

Denver, CO 80202

(303) 861-2828

jbiever@williamsweese.com

cromo@williamsweese.com

Jennifer L. Bradfute

David Kirmse

P.O. Box 90233

Albuquerque, NM 87199

(505) 264-8740

jennifer@bradfutelaw.com

*Counsel for Applicant Yucca Growth
Infrastructure, LLC*

Certificate of Service

I hereby certify that on July 28, 2026 a copy of the foregoing Applicant Yucca Growth Infrastructure, LLC's Notice to Respond to Motions for Discovery was emailed to the persons listed below.

Christopher Vigil
Brian Yardman-Frank
New Mexico Environment Department
Office of General Counsel
121 Tijeras Avenue NE,
Suite 1000 Albuquerque, NM 87102
chris.vigil@env.nm.gov
brian.yardman-frank@env.nm.gov
Counsel for NMED

Max Shepherd
max.shepherd@comcast.net
Hearing Officer

Luis Lopez
Luis.lopez@env.nm.gov
Hearing Clerk

Bruce Wetherbee
60 Concord, Massachusetts 01742
editor@thecandlepublishing.com
(505) 501-1570

Joe Cardillo
344 4th Street SW
Albuquerque, NM 87102
joe@progressnownm.org
(505) 221-5661

Nicholas Maxwell
P.O. Box 1064
Hobbs, New Mexico 88241
(575) 441-3560
inspector@sunshineaudit.com

Isaiah Zemke
izemke@smwlu49.org
Sheet Metal Workers Local Union No. 49

Colin Cox
Gail Evans
PO Box 31417
Santa Fe, NM 87594
(832) 316-0580
ccox@biologicaldiversity.org
gevans@biologicaldiversity.org

Christine Dobbin
1 Cielo Azul Anthony, NM 88021
dobbin.cc@gmail.com
(915) 412-9148

Nathaniel Chakeres
General Counsel
New Mexico Office of the State Engineer
P.O. Box 25102
Santa Fe, NM 87504-5012
(505) 231-4459
nathaniel.chakeres@ose.nm.gov

Yiwei Chen
Economic Development New Mexico
P.O. Box 20003
Santa Fe, NM 87504-5003
(505) 394-5481
yiwei.chen@edd.nm.gov

Andre Makarski
United Association Local 412
510 San Pedro
Albuquerque, NM 87108
andre@ualocal412.org

Maslyn Locke
Senior Staff Attorney
Eric Jantz
Legal Director
New Mexico Environmental
Law Center
(505) 989-9022
mlocke@nmelc.org
ejantz@nmelc.org

Mariel Nanasi
Christopher Dodd
422 Old Santa Fe Trail
Santa Fe, NM 87501
MNanasi@NewEnergyEconomy.org
chris@fayerbergdodd.com
505.469.4060
Counsel for New Energy Economy

Esperanza Chairez
YUCCA Policy Campaign Manager
esperanza@yuccanm.org

Courtenay Eichhorst
411 Arizona ST. Albuquerque, NM 87109
courtenaye@ualocal412.org
New Mexico Building and Construction Trades Council

/s/ Jennifer Biever