

BEFORE THE MISSISSIPPI COMMISSION
ON ENVIRONMENTAL QUALITY

MISSISSIPPI COMMISSION ON
ENVIRONMENTAL QUALITY

VS.

ORDER NO. 7739 26

MZX TECH LLC
2875 STANTON ROAD
SOUTHAVEN, MS 38671

AGREED ORDER

COME NOW the Mississippi Commission on Environmental Quality (Commission), acting through the staff and Executive Director of the Mississippi Department of Environmental Quality (MDEQ), and MZX Tech LLC (MZX), in the above captioned cause and agree as follows:

1.

MZX operates sixty-nine (69) portable, temporary simple cycle natural gas-fired combustion turbines (as more fully described in Appendix A) on its property located at 2875 Stanton Road, Southaven, Desoto County, Mississippi (Stanton Road Facility).

By letter dated July 29, 2025, MDEQ acknowledged that the turbines remaining affixed to a portable unit and remaining on site for twelve months or less constituted “mobile sources” that are not subject to stationary source air permitting requirements pursuant to 11 Mississippi Administrative Code Part 2, Chapter 2, Rule 2.13.D.

However, MDEQ’s July 29, 2025, letter requested that MZX operate the mobile turbines in a manner that minimizes the emission of nitrogen oxides (NO_x) and particulate matter less than 2.5 microns in diameter (PM_{2.5}) through the implementation of additional emission control technology available and applicable to portable combustion turbines. MZX implemented such controls.

MDEQ's July 29, 2025, letter also recognized MZX's representation that the use of each mobile turbine would be temporary. Based on MZX's representations, MDEQ exercised its discretion to allow the operation of the turbines as "mobile sources" under the state's EPA-approved State Implementation Plan and asked MZX to use each mobile turbine for no more than one year and ensure each mobile turbine would remain portable at all times.

From time to time and most recently on June 12, 2026, MZX provided the unit number, unit type, emission control, total power output, and the date added for each mobile turbine on site at the Stanton Road Facility. Appendix A contains a complete inventory of MZX's mobile turbines. MZX agrees that no additional mobile turbines will be brought on site after July 15, 2026.

Of the sixty-nine (69) mobile turbines currently at the Stanton Road Facility, fourteen (14) Solar Mobile Turbomachinery Titan 130 (SMT-130) turbines include selective catalytic reduction (SCR) emission controls which control, among other substances, the emission of nitrogen dioxide and oxidation catalyst (oxcat) emission controls, which control, among other substances, the emission of carbon monoxide and volatile organic compounds. Such emission controls, while not required for mobile turbines, are capable of meeting or exceeding the emissions limitations required by the Clean Air Act's Best Available Control Technology standards according to the manufacturer's specifications.

Following an approximately seven-month process, on March 11, 2026, the Mississippi Environmental Quality Permit Board issued a Prevention of Significant Deterioration (PSD) Permit to Construct Air Emissions Equipment at the Stanton Road Facility (the "PSD permit"). Among other things, the PSD permit authorized the construction of forty-one (41) stationary combustion turbines which will be the permanent power source for MZX's advanced computing facilities.

The MZX PSD permit imposes the most stringent emission limitations applicable to stationary combustion turbines located at a major stationary source. The 14 SMT-130 mobile turbines in use at the Stanton Road Facility are capable of meeting or exceeding the emission limitations for stationary combustion turbines contained in the MZX PSD permit.

Due to supply chain challenges, the construction schedule for some of the 41 stationary combustion turbines covered by the PSD permit has been delayed. As a result, MZX has informed MDEQ of the need to operate the 13 of the 14 SMT-130 mobile turbines beyond the original twelve-month period contemplated by MDEQ's July 29, 2025, letter until the permitted stationary turbines can be constructed.

MZX has proposed a retirement schedule for the use of mobile turbines as outlined in Appendix A. Because all of the mobile turbines except for 13 of the 14 SMT-130 turbines will cease operation no later than twelve months after they were brought onsite as required by MDEQ's July 29, 2025, letter, and because all of the SMT-130 turbines are able to meet the emission limitations in the MZX PSD permit applicable to stationary combustion turbines and will cease operations no later than December 31, 2026, MDEQ is exercising its discretion to allow 13 of the 14 SMT-130 turbines to continue to operate as "mobile sources" through a December 31, 2026 deactivation deadline, pursuant to 11 Mississippi Administrative Code Part 2, Chapter 2, Rule 2.13.D.

2.

In light of the foregoing, MDEQ and MZX agree as follows:

A. MDEQ and MZX agree that MZX's operation of the mobile turbines identified in Appendix A without separate construction or operating permits has not violated Mississippi air permitting requirements. MZX's continued operation of those mobile turbines through their

respective deactivation deadlines established by this Agreed Order likewise will not constitute a violation, provided that MZX fully and timely complies with all applicable conditions of this Agreed Order. Nothing in this paragraph authorizes operation of any temporary turbine after its applicable deactivation deadline, with the exception of 13 of the 14 SMT 130's which are using SCR emission controls, or relieves MZX of compliance with any requirement not expressly addressed in this Agreed Order.

B. MDEQ and MZX agree that as a continued condition of the July 29, 2025, letter, MZX shall continue to operate the emission controls designated for each mobile turbine in Appendix A until such time as each turbine ceases operation at the Stanton Road Facility, which shall be no later than the "Retirement Date" established in Appendix A.

C. MDEQ and MZX agree that as a continued condition of the July 29, 2025, letter that all mobile turbines in Appendix A must cease operations at the Stanton Road Facility no later than the "Retirement Date" established in Appendix A.

D. MDEQ and MZX agree that MZX will not add any additional mobile source turbines at the Stanton Road Facility after July 15, 2026.

E. MZX shall provide a report to MDEQ on a bi-weekly basis indicating all temporary turbines listed in Appendix A that have been deactivated within the preceding two-week period. These reports shall commence on the date this Agreed Order becomes fully executed.

F. MZX shall begin emissions testing for the 14 SMT-130 turbines in Appendix A within sixty (60) days of the date this Agreed Order becomes fully executed. Such testing must be conducted for, at a minimum, carbon monoxide, nitrogen dioxide and volatile organic compounds. Results of such testing shall be reported to MDEQ within thirty (30) days of the date the testing was conducted. In addition, and beginning on the day after the emissions testing is

conducted, MZX shall conduct continuous temperature and pressure monitoring on the 14 SMT-130 turbines and shall report such data to MDEQ on a bi-weekly basis.

G. MDEQ and MZX agree that if MZX fails to adhere to any of these conditions B through F for a particular mobile turbine, that mobile turbine will immediately cease to qualify as a “mobile source” under 11 Mississippi Administrative Code Part 2, Chapter 2, Rule 2.13.D. and become subject to stationary source permitting requirements.

3.

Nothing in this Agreed Order shall limit the rights of MDEQ or the Commission in the event MZX fails to comply with this Agreed Order. This Agreed Order shall be strictly construed to apply to those matters expressly addressed herein.

4.

Nothing in this Agreed Order shall limit the rights of MDEQ or the Commission to take enforcement action or other actions against MZX for matters not addressed herein and for future violations of environmental laws, rules, and regulations.

ORDERED, this the 30th day of July, 2026.

MISSISSIPPI COMMISSION ON
ENVIRONMENTAL QUALITY

BY:


CHRIS WELLS
EXECUTIVE DIRECTOR
MISSISSIPPI DEPARTMENT OF
ENVIRONMENTAL QUALITY

AGREED, this the 29th day of July, 2026.

MZX TECH LLC

BY: [Signature] / James Burnham

TITLE: General Counsel

STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

PERSONALLY appeared before me, the undersigned authority in and for the jurisdiction aforesaid, the within named JAMES BURNHAM who first being duly sworn, did state upon his/her oath and acknowledge to me that he/~~she~~ is the GENERAL COUNSEL of MZX Tech LLC and is authorized to sign and enter this Agreement on its behalf.

SWORN AND SUBSCRIBED BEFORE ME, this the 29th day of July, 2026.

SEE ATTACHED JURAT
NOTARY PUBLIC

My Commission expires: 06/04/2030

JURAT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Santa Clara

Subscribed and sworn to (or affirmed) before me on this 29th day of July, 2026, by
JAMES BURNHAM

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.



(Seal)

Signature

Cathy

Optional information. This certificate is attached to:

Title or type of document: BEFORE THE MISSISSIPPI COMMISSION ON ENVIRONMENTAL QUALITY
AGREED ORDER

Number of pages: 9

Date of document: JULY 29, 2026

Signer(s) other than named above: CHRIS WEULS

Notary phone number: 650-290-3550 or 408-355-3700

APPENDIX A

Unit	Unit Type	Control	Nameplate Capacity (MW)	Expected Local Power Output (MW)¹	Date Added	Retirement Date
1	SMT-130	SCR+oxcat	16.48	13	8/1/2025	12/31/2026
2	SMT-130	SCR+oxcat	16.48	13	8/1/2025	12/31/2026
3	SMT-130	SCR+oxcat	16.48	13	8/1/2025	12/31/2026
4	SMT-130	SCR+oxcat	16.48	13	8/18/2025	12/31/2026
5	SMT-130	SCR+oxcat	16.48	13	8/19/2025	12/31/2026
6	SMT-130	SCR+oxcat	16.48	13	8/20/2025	12/31/2026
7	SMT-130	SCR+oxcat	16.48	13	8/21/2025	12/31/2026
8	Gen 8 TM2500	Demin Water	30	30	8/19/2025	8/18/2026
9	Gen 8 TM2500	Demin Water	30	30	8/23/2025	8/22/2026
10	Gen 7 TM2500	Demin Water	25	25	8/28/2025	8/27/2026
11	Gen 7 TM2500	Demin Water	25	25	8/28/2025	8/27/2026
12	Gen 6 TM2500	Demin Water	25	22	8/26/2025	8/25/2026
13	Gen 6 TM2500	Demin Water	25	22	8/26/2025	8/25/2026
14	Gen 6 TM2500	Demin Water	25	22	8/27/2025	8/26/2026
15	Gen 6 TM2500	Demin Water	25	22	8/28/2025	8/27/2026
16	Gen 7 TM2500	Demin Water	25	25	8/28/2025	8/27/2026
17	Gen 7 TM2500	Demin Water	25	25	8/29/2025	8/28/2026
18	Gen 8 TM2500	Demin Water	30	25	8/25/2025	8/24/2026
19	Gen 8 TM2500	Demin Water	30	25	12/18/2025	12/17/2026
20	Gen 7 TM2500	Demin Water	25	25	12/18/2025	12/17/2026
21	SMT-130	SCR+oxcat	16.48	13	11/30/2025	12/31/2026
22	SMT-130	SCR+oxcat	16.48	13	11/30/2025	12/31/2026

¹ Expected local power output is estimated based on ambient conditions of 59 °F and 60 percent humidity.

Unit	Unit Type	Control	Nameplate Capacity (MW)	Expected Local Power Output (MW)¹	Date Added	Retirement Date
23	SMT-130	SCR+oxcat	16.48	13	11/30/2025	12/31/2026
24	SMT-130	SCR+oxcat	16.48	13	12/3/2025	12/31/2026
25	SMT-130	SCR+oxcat	16.48	13	12/5/2025	12/31/2026
26	SMT-130	SCR+oxcat	16.48	13	12/7/2025	12/31/2026
27	SMT-130	SCR+oxcat	16.48	13	1/6/2026	12/31/2026
28	Gen 8 TM2500	Demin Water	30	30	3/25/2026	3/24/2027
29	Gen 8 TM2500	Demin Water	30	30	5/2/2026	5/1/2027
30	Gen 8 TM2500	Demin Water	30	30	4/3/2026	4/2/2027
31	Gen 8 TM2500	Demin Water	30	30	3/25/2026	3/24/2027
32	Gen 8 TM2500	Demin Water	30	30	4/27/2026	4/26/2027
33	Gen 8 TM2500	Demin Water	30	30	3/27/2026	3/26/2027
34	Mitsubishi FT8	Demin Water	30	30	3/24/2026	3/23/2027
35	Mitsubishi FT8	Demin Water	30	30	3/25/2026	3/24/2027
36	Mitsubishi FT8	Demin Water	30	30	3/25/2026	3/24/2027
37	Mitsubishi FT8	Demin Water	30	30	3/25/2026	3/24/2027
38	Mitsubishi FT8	Demin Water	30	30	4/3/2026	4/2/2027
39	Mitsubishi FT8	Demin Water	30	30	4/3/2026	4/2/2027
40	Mitsubishi FT8	Demin Water	30	30	4/23/2026	4/22/2027
41	Mitsubishi FT8	Demin Water	30	30	4/28/2026	4/27/2027
42	Gen 4 TM2500	Demin Water	25	25	4/28/2026	4/27/2027
43	Gen 4 TM2500	Demin Water	25	25	4/28/2026	4/27/2027
44	Gen 4 TM2500	Demin Water	25	25	4/28/2026	4/27/2027
45	Gen 4 TM2500	Demin Water	20	20	5/1/2026	4/30/2027
46	Gen 4 TM2500	Demin Water	20	20	6/10/2026	6/9/2027

Unit	Unit Type	Control	Nameplate Capacity (MW)	Expected Local Power Output (MW)¹	Date Added	Retirement Date
47	Gen 4 TM2500	Demin Water	20	20	5/1/2026	4/30/2027
48	Gen 8 TM2500	Demin Water	30	30	5/6/2026	5/5/2027
49	Gen 8 TM2500	Demin Water	30	30	5/2/2026	5/1/2027
50	Gen 8 TM2500	Demin Water	30	30	5/2/2026	5/1/2027
51	Gen 8 TM2500	Demin Water	30	30	5/2/2026	5/1/2027
52	Gen 8 TM2500	Demin Water	30	30	5/2/2026	5/1/2027
53	Gen 8 TM2500	Demin Water	30	30	5/2/2026	5/1/2027
54	Gen 6 TM2500	Demin Water	25	25	5/3/2026	5/2/2027
55	Gen 6 TM2500	Demin Water	25	25	6/9/2026	6/8/2027
56	Mitsubishi FT8	Demin Water	30	30	5/7/2026	5/6/2027
57	Mitsubishi FT8	Demin Water	30	30	5/6/2026	5/5/2027
58	Mitsubishi FT8	Demin Water	30	30	5/9/2026	5/8/2027
59	Mitsubishi FT8	Demin Water	30	30	5/9/2026	5/8/2027
60	Gen 6 TM2500	Demin Water	25	22	5/9/2026	5/8/2027
61	Mitsubishi FT8	Demin Water	30	30	7/9/2026	7/8/2027
62	Mitsubishi FT8	Demin Water	30	30	7/9/2026	7/8/2027
63	Mitsubishi FT8	Demin Water	30	30	7/9/2026	7/8/2027
64	Mitsubishi FT8	Demin Water	30	30	7/10/2026	7/9/2027
65	Mitsubishi FT8	Demin Water	30	30	7/10/2026	7/9/2027
66	Mitsubishi FT8	Demin Water	30	30	7/10/2026	7/9/2027
67	Mitsubishi FT8	Demin Water	30	30	7/14/2026	7/13/2027
68	Mitsubishi FT8	Demin Water	30	30	7/15/2026	7/14/2027
69	Mitsubishi FT8	Demin Water	30	30	7/15/2026	7/14/2027