

New Mexico Gas Company, Inc.

It is respectfully requested that the attached letter from New Mexico Gas Company, Inc. be included with the commentary regarding EIB 25-11 (R) - Proposed New Regulation, 11.5.7 NMAC - Heat Illness and Injury Prevention. We appreciate the consideration if possible. Thank you.



Raymond Sanchez
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June 2, 2025

New Mexico Environmental Improvement Board
P.O. Box 5469
Santa Fe, New Mexico 87502-5469

Re: EIB 25-11(R) Proposed Regulation 11.5.7 NMAC - Heat Illness and Injury Prevention

Dear Environmental Improvement Board Commissioners:

New Mexico Gas Company, Inc., (NMGC) opposes the proposed Heat Illness Prevention outlined in 11.5.7 NMAC as written.

At New Mexico Gas Company, ensuring the safety of our employees is a top priority. Our robust safety policies, procedures and practices emphasize the importance of working safely in all conditions across New Mexico, including in high heat environments. Our employee training highlights measures that help to mitigate potential heat-related illnesses and injuries, including but not limited to taking frequent breaks, staying hydrated (with both water and electrolytes), wearing company-provided appropriate cooling clothing and cooling areas, and adjusting work hours. In addition, NMGC conducts employee safety initiatives throughout the year, which includes summer programming that focuses on working safely in the summer heat.

While NMGC shares the regulators' concerns about ensuring the safety and wellbeing of all our employees, we already have implemented appropriate practices and measures to ensure the safety of our employees working in high-heat environments. As a result of the numerous efforts and practices we have built into our safety culture, the lack of sufficient data to support the proposed rule is concerning. Further, the requirements of the proposed rule are unclear and overly burdensome, in particular because the proposed rule does not account for companies, such as NMGC, that already account for employee health and wellbeing in their working environments. Accordingly, NMGC opposes the proposed rule and appreciates your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Raymond G. Sanchez". The signature is fluid and cursive, with the first and last names being more prominent.

Raymond G. Sanchez
Vice President Operations
New Mexico Gas Company, Inc.