

Butch's Rathole & Anchor Service Inc.

On behalf of Butch's Rathole & Anchor Service, Inc., I'd like to share our concerns regarding the proposed Heat Illness and Injury Prevention Rule (11.5.7 NMAC). While we fully support protecting workers from heat-related illness and agree that heat safety is a serious issue, the rule as written poses some practical challenges for field operations in our line of work.

We operate across New Mexico and West Texas, often in extreme heat, and already have solid programs in place—hydration plans, crew education, rest schedules, and acclimatization practices that fit the nature of oilfield work. That said, parts of the proposal feel too rigid to apply in remote job sites and constantly changing field conditions.

A few specific concerns:

The required work/rest schedules during high heat may not leave room for flexibility based on the type of work being done or the condition of the worker.

The acclimatization timeline doesn't account for experienced hands returning from short time off who are still heat-adapted.

The expectation for shaded or mechanically cooled rest areas within a 2-minute walk of every work area just isn't practical in many locations we work.

We're not against strengthening protections—we just think there needs to be more consideration for how different industries operate, especially those with mobile or remote crews. We'd appreciate a more flexible approach that allows employers to meet the intent of the rule without creating operational barriers.

Thank you for the opportunity to provide feedback. We're committed to safety and would welcome the chance to stay involved in this discussion.