

## Stanton, Irene

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**From:** .....  
**Sent:** Thursday, February 18, 2010 4:24 PM  
**To:** Stanton, Irene  
**Cc:** William Honn  
**Subject:** DRMS Hardrock Mining, Prospecting, and Bonding Rulemaking

Feb. 14, 2010  
Bill Honn

Colorado Mined Land Reclamation Board  
Attention: Ms. Irene Stanton  
1313 Sherman Street, Room 215  
Denver, CO 80203

*RE: Rulemaking to Amend the Mineral Rules and Regulation of the Colorado Mined Land Reclamation Board for Hard Rock, Metal and Designated Mining Operations*

To Colorado Mined Land Reclamation Board:

I have several concerns on the rulemaking amendments for mineral rules and regulations. They are as follows:

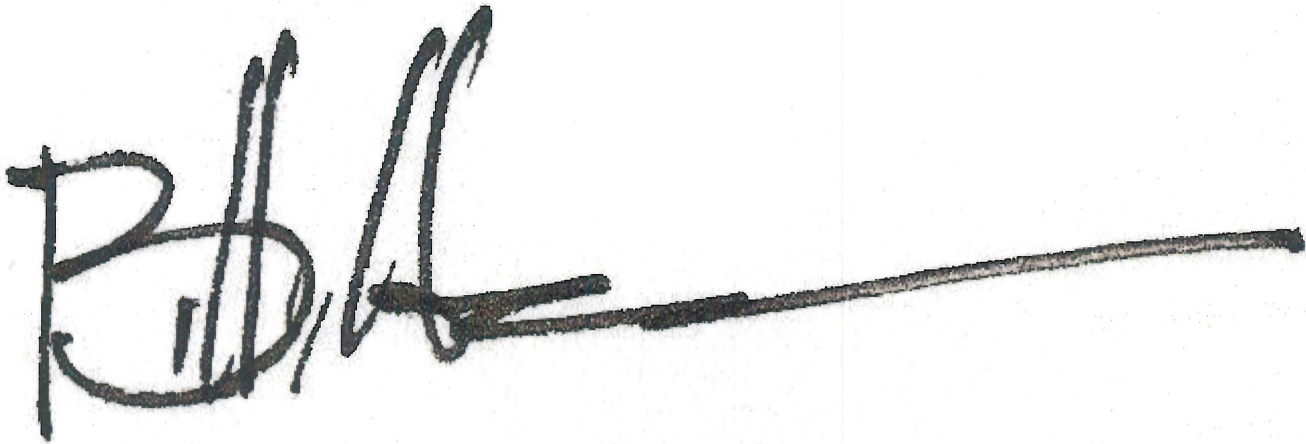
- You will undoubtedly hear mining opponents' concerns that ISL operators seek to weaken the groundwater restoration standards set out in HB 1161:
  - If that argument is used as a basis against sequential determination of baseline. That argument must be rejected.
  - As long as operators supplement initial baseline data with pre-mining data, it does not matter if that data is gathered before or after the permit is granted.
  - At a minimum, the rules should encourage operators to supplement their baseline data with any data they acquire prior to production.
  - Arguments requesting the same data be collected prior to permitting that can be obtained after permitting and prior to production provide no additional groundwater protection, are based solely on political concerns, and have no scientific basis.
- You will try to be convinced that the public has a right to comment on prospecting and exploration activities:
  - These activities have been confidential, for good reason, since the early days of mining.
  - Mining opponents intend to use the public comment provision to usurp the property rights of owners of mineral rights.
  - Mining opponents will abuse the public comment period to delay exploration activities.
  - The statute does not grant the agency the authority to grant third parties such a right.

- Delaying exploration is not an activity that warrants implementation at the rulemaking level. Only the legislature can enact that type of intention.
- You should pass only the narrowest prohibition on participating in our workforce upon individuals.
  - A showing of direct harm by an individual must be the standard that is used to keep individuals from working in Colorado.

Thank you for taking my concerns into consideration of these rules. These rules will have a major impact on the economies of Colorado communities. Our economy can no longer withstand the grip of ever increasing regulations that only operate to satisfy ideological politics. I don't want the USA to be held hostage to uranium production in foreign countries. Let's allow Americans to work in America.

It is time to have our regulators operate under sound science.

Thank you,

A handwritten signature in black ink, appearing to read 'Bill Honn', followed by a long horizontal line extending to the right.

Bill Honn  
Water Treatment Consultant