

McDermott, Steve

Subject: FW: DRMS Hardrock Mining, Prospecting, and Bonding Rulemaking-Stille

From: Sent: Monday, February 22, 2010 9:28 AM
To: Stanton, Irene
Cc:
Subject: DRMS Hardrock Mining, Prospecting, and Bonding Rulemaking

2-22-2010

Colorado Mined Land Reclamation Board
Attn: Irene Stanton
1313 Sherman St, Room 215
Denver, Colorado
80203

Subject: Division of Reclamation, Mining and Safety Rulemaking

Dear Ms. Stanton,

Please accept the following comments on the above-referenced rulemaking now occurring in the Colorado Mined Land Reclamation Board.

Mining operations have to comply with innumerable state and federal rules and regulations. For the most part, this is very good. It makes US mining and resource production the best, cleanest and safest in the World. However, in many respects it goes too far, especially when you have overlapping and redundant state and federal laws and regulations – or worse, conflicting state and federal laws and regulations. In many respects, the proposed rules directly conflict with federal rules, including the Safe Drinking Water Act. It is important that your agency closely review the rules to ensure there are no conflicts.

For instance, it appears there is the possibility of a company having to post both a state and a federal bond. This is redundant and does nothing to protect the public. All it does is cost companies money which they can better use in research and development, hiring, and expansion.

I would support the Division of Reclamation and Mining Safety entering into Memorandums of Understanding with other agencies with oversight of in situ uranium mining operations to clearly define their respective spheres of influence and regulation. Providing clear rules and a clear “division of labor” in regulations provides these companies with the regulatory certainty they need to make good investment decisions that help the Colorado economy.

Thank you,

Gene Stille