



NEW MEXICO ENVIRONMENTAL LAW CENTER

November 17, 2009

Mr. Bill Brancard
Director, New Mexico Mining and Minerals Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

RE: Public Notice of Roca Honda Mine Permit Application

Dear Mr. Brancard:

On November 10, the New Mexico Environmental Law Center received a notice from Strathmore Minerals, doing business as Roca Honda Resources, LLC ("RHR"), advising the public of RHR's application for a mine permit. The public notice also advised of the opportunity to submit comments on the mine application and to request a hearing on the application.

On behalf of the Multicultural Alliance for a Safe Environment ("MASE"), please be informed that MASE hereby requests a hearing on RHR's mine permit application pursuant to NMAC 19.10.9.904.A. MASE is a coalition of non-profit organizations representing uranium mining impacted communities. MASE's members live and work in uranium impacted communities and are concerned about the environmental and public health impacts renewed uranium will have on their communities.

The bases for MASE's hearing request are as follow:

First, RHR's permit application is the first permit application for a uranium mine under the New Mexico Mining Act, NMSA 1978 §§ 69-36-1 *et. seq.* As such, the process for evaluating this permit application will set the standard for all future uranium mining permit applications under the Mining Act. Additionally, the Mining and Minerals Division's legal and technical decisions will be the precedent for all future decisions. As members of communities who will bear the burden of these decisions, MASE members have a strong interest in having their concerns heard.

Second, RHR's permit application is both lengthy and technical. Members of uranium impacted communities are able to offer a unique perspective and technical insight based on experience that RHR and the Division may overlook.

Finally, even a cursory inspection of RHR's permit application reveals numerous deficiencies, for example, in its proposed reclamation plan and its proposed plans for protecting cultural properties. The members of the communities that will be impacted by RHR's operations should be given the opportunity to point out these deficiencies to the Division in a public forum.

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For the above reasons, a hearing should be held on the RHR mine application. I look forward to your response and please do not hesitate to contact me if you have any questions or need additional information.

Sincerely,

Eric Jantz
Staff Attorney

cc: Juan Velasquez

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