

 3101 Wilson Blvd. Ste 230
Arlington, VA 22201

 703-562-0000

 essentialminerals.org

July 31, 2025

James P. McHugh
Deputy Assistant Secretary for Policy
Mine Safety and Health Administration
200 Constitution Ave NW
Washington, DC 20210

Submitted Electronically

Re: Drilling; Docket: MSHA-2025-0082

Dear Deputy Assistant Secretary McHugh,

The Essential Minerals Association (EMA) is pleased to have the opportunity to comment on *Drilling, MSHA-2025-0082*, and other deregulatory actions MSHA made available for comment on July 1, 2025. EMA is the representative voice of approximately 100 companies that extract, process, and support a vital and beneficial group of raw minerals that are the essential ingredients for many of the products used in everyday life.

The minerals produced by EMA's members are vital to the manufacturing processes for many, if not all, of the products we use daily. Every industry sector relies on various essential minerals to generate its end products, making a robust and stable supply chain critical for the continued growth and success of our economy and national security.

EMA concurs with MSHA's assessment that the inspection and maintenance obligations of drilling specified in 30 CFR 56.7002 and §56.7003 are redundant when compared to the requirements posed by §§56.14100 and 56.18002. While there may be concerns that the replacement language does not explicitly state the requirement that safety defects shall be corrected *before* the equipment is operated, EMA believes that the §56.14100(c) adequately sets this expectation of elimination of defects "hazardous to persons" by taking drilling equipment out of service until the hazard is corrected. We agree that eliminating this text would not lessen the protections of miners. This approach by MSHA, alongside similar initiatives such as the one governing aerial tramways (*Docket: MSHA 2025-0081*), will foster a more uniform approach to inspection standards.

EMA appreciates MSHA's efforts to streamline and enhance the efficiency of regulatory language governing mining safety by eliminating unnecessary duplication. We look forward to future opportunities to provide feedback as MSHA explores further areas for deregulation and consistency in regulatory text.

Should any additional information be required, please contact me at chrisgreissing@essentialminerals.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Greissing". The signature is fluid and cursive, with the first name "Chris" being larger and more prominent than the last name "Greissing".

Chris Greissing
President, Essential Minerals Association

