My name is John Jordan. I am a member of the executive board of Central Mine Rescue, a not for profit corporation in the State of Idaho, organized for the purpose of improving mine rescue response and the ability of member and associate member mines to provide mine rescue coverage. Central Mine Rescue was organized in 1923 to provide mutual support for the mines in the Coeur d'Alene mining district. Member mines and associate member mines are located throughout the Western United States.

Members and Associate Members Mines include:

Kennecott - Greens Creek Mine, Juneau, Alaska Coeur Silver Valley - Galena Mine, Wallace, Idaho Cominco American - Pend Oreille Mine, Metaline Falls, Washington Genesis, Inc. - Troy Mine, Troy, Montana Hecla Mining Co. - Lucky Friday Mine, Mullan, Idaho Kinross Gold - Kettle River Operations, Republic Washington Sterling Mining Co. - Sunshine Mine, Kellogg, Idaho Teck-Pogo Inc. - Pogo Mine, Delta Junction, Alaska Bunker Hill Mining Co. - Bunker Hill Mine, Kellogg, Idaho Bullion River Gold - North Fork Mine, Forest City, California Bullion River Gold - French Gulch Mine, Redding, California Coeur-Alaska - Kensington Mine, Juneau, Alaska Dutch Mining LLC - Dutch Mine, Grants Pass, Oregon Discovery Day Mine, Forks of Salmon, California J. S. Redpath - Round Mountain Project, Round Mountain, Nevada Mystery Creek Resources - Nixon Fork Mine, McGrath, Alaska New Jersey Mining Co. - Golden Chest Mine, Prichard, Idaho 16 to 1 Mining Co. - Morning Glory Mine, Alleghany, California Paystreak Mine, Prescott, Arizona Royal Standard Minerals - Goldwedge Mine, Manhattan, Nevada Resolution Copper Mining Co. - Resolution Mine, Superior, Arizona Small Mines Development - Getchell Mine, Winnemucca, Nevada Tri-Con Mining Alaska - Nolan Creek Mine, Coldfoot, Alaska

Today, I am speaking on behalf of Central Mine Rescue and would like to direct my comments to the Request for Information published in the Federal Record on January 25, 2006 seeking "comments, data, and other information on topics relevant to underground mine rescue equipment and technology."

In opening, let me say that the keys to successful mine rescue lie in good preparation and quick response by properly trained and properly equipped rescue personnel. This is not achieved through reactionary, cookie cutter solutions. It is achieved through solid commitment by mining companies to the preparedness of their mine rescue teams, solid support by state and federal officials to the business of preparing mine rescue teams and the solid dedication of the individual mine rescue team members.

The mining industry is a natural resource industry. We exist by finding ways to capitalize on the myriad of valuable mineral deposits that have blessed this country. To the extent that nature has made each mineral deposit unique, each mine is unique, and unlike all others. There is no single communications tracking system; there is no single refuge chamber design; there is no single response protocol, there is no single training program that can be applied – across the board to all mining operations – that will ensure a successful ending to every mine rescue operation.

Central Mine Rescue applauds the efforts to conduct a thorough search for technologies that can assist or improve rapid mine emergency response. Central Mine Rescue applauds the efforts to identify new technology that supports improved training and equipping of mine rescue teams. Central Mine Rescue applauds the efforts to identify new technology that will improve our industry's ability to track the location of trapped miners within a mine.

However, Central Mine Rescue strongly questions the emerging trend of promulgating new legislation that mandates the use of specific technologies when other technologies may already exist that serve equally well or better to achieve those same ends. The Mine Safety & Health Administration has, since its inception, recognized that Coal/Metal-Nonmetal/Surface and Underground mine environments are different environments. Central Mine Rescue cannot support any effort that fails to recognize the inherent differences between Coal mines and Metal/Nonmetal mines. Existing regulations have the flexibility to accommodate the unique character of each operation and to allow mine operators to determine which technologies they will implement in their operation to meet the requirements of the regulations. Central Mine Rescue believes the loss of this flexibility through the promulgation of punitive legislation will not improve mine rescue ability, it will reduce it.