

UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549

December 13, 2011

Via E-mail
Mr. David S. Bryson
Chief Financial Officer
Hudbay Minerals Inc.
Dundee Place, Suite 2501
1 Adelaide Street East
Toronto, Ontario
M5C 2V9 Canada

Re: Hudbay Minerals Inc.

Form 40-F

Filed March 31, 2011 File No. 001-34244

Dear Mr. Bryson:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ John Reynolds

John Reynolds Assistant Director