



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 3561

November 20, 2015

Via E-mail

Mr. David S. Bryson  
Chief Financial Officer  
HudBay Minerals, Inc.  
25 York Street  
Suite 800  
Toronto, Ontario  
M5J 2V5, Canada

**Re: HudBay Minerals, Inc.  
Form 40-F for the Year Ended December 31, 2014  
Filed March 31, 2015  
File No. 1-34244**

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 filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/Tia L. Jenkins

Tia L. Jenkins  
Senior Assistant Chief Accountant  
Office of Beverages, Apparel, and  
Mining