

June 21, 2005

## VIA EMAIL: jstevenson@osc.gov.on.ca

By email and mail

Mr. John Stevenson Ontario Securities Commission 20 Queen St. W. Suite 1900, Box 55 Toronto, ON M5H 3S8

Dear Sir

re: Proposed CSA Rule MI 52-111 (the "Policy") Far West Mining Ltd. (the "Company")

I am writing to you on behalf of the Company and its shareholders to voice our strong opposition to the proposed CSA Rule MI 52-111. I am the Vice-President and Director of the Company, a TSXV listed company. As well, I am a geologist that has been involved with junior mining companies for over twenty years.

I have discussed the proposed policy with our shareholders, Board of Directors, senior management, lawyers and accountants and we have failed to find that the Policy provides any material benefit to either our shareholders or to the public.

We have accounting professionals manage our financial affairs according to the highest ethical and accounting standards and we are audited annually. As a small company, we carefully watch our spending on G&A as our shareholders want the majority of their money invested on exploration and on management time spent developing its assets and on growing the business of the Company.

One of the main requirements of the Policy is particularly offensive. The proposed requirement for a regular independent auditor review of internal controls will easily more than double our yearly auditor costs with *no* benefit to our shareholders. We already have rigorous internal controls, an independent Board of Directors, an independent Auditor and *extensive* regulatory reporting requirements.

The existing regulations are more than sufficient to govern the corporate internal control practices of small companies. The annual audit of a small company like ours is more than enough to detect accounting irregularities. As we also expect to list on the Toronto Stock Exchange in the near future, and

to retain the majority of our funds for mining purposes, we would not be in favour of a lower 'cap' which would just exempt us now, but hit us once we are on the TSE. The majority of companies on the TSE, let alone TSXV juniors, cannot afford the financial burden of MI 52-111.

It is a duty of the CSA to provide *reasonable cost-effective* protection to the investors in public companies. Protection includes protecting a viable, cost efficient market. You should not add on a totally new and very costly regulatory burden with very little, if any, benefits.

Our shareholders do not support MI 52-111 and would not benefit from it.

Yours truly,

Mor.

J. Patricio Varas, P. Geo. Vice President and Director **Far West Mining Ltd.**