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July 23, 2010

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**Securities Commission of Newfoundland
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Nova Scotia Securities Commission

**Registrar of Securities, Prince Edward
Island**

DM_TOR/211780-17738/3762793.1

Superintendent of Securities, Nunavut

**Superintendent of Securities, Yukon
Territory**

**Superintendent of Securities, Northwest
Territories**

To all:

Re: Request for Comments – Proposed Repeal and Replacement of National Instrument 43-101 – *Standards of Disclosure for Mineral Projects*, Form 43-101F1 *Technical Report*, and Companion Policy 43-101 CP

Further to our letter dated July 19, 2010 in response to the request for comments of the Canadian Securities Administrators published April 23, 2010 on the proposed repeal and replacement of National Instrument 43-101 (“**NI 43-101**”), Form 43-101F1, and Companion Policy 43-101 CP, we would like to provide an addendum to our initial comments.

DEFINITION OF PRELIMINARY ECONOMIC ASSESSMENT

We fully support the proposed change to the definition of “preliminary assessment” and its endorsement of the usefulness of the economic analysis of the potential viability of resources at any stage of the project as opposed to only an early stage of the project.

Where the development of a mine changes through the discovery of another ore body that may require different mining methods (i.e. underground as opposed to open pit or different methods of extraction such as concentrator and carbon leach process as opposed to heap leaching), an economic analysis of such a change in the development of the mine on the basis of inferred resources, subject of course to the normal qualifications that

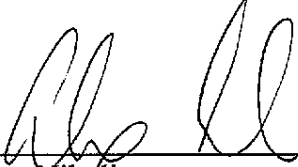
accompany an economic analysis, offers the required flexibility for mining issuers to access the capital markets in a timely and cost effective manner.

Thank you for this opportunity to provide these additional comments on the proposed amendments to NI 43-101. If you have any questions concerning this letter, please direct them to Robert Shirriff at 416 865 4434 or Alex Nikolic at 416 865 4420.

Yours very truly,



Robert L. Shirriff



Alex Nikolic