

Dear Sheryl:

Craig Waldie sent me the proposed changes two months ago and I have had the opportunity to carefully examine them from my perspective as representative of an international consulting group which conducts dozens of 43-101 Technical Reports per year. Our perspective is that the proposed changes are an improvement over the existing standards because of better definitions and improved flexibility. Comments are as follows:

1. The expanded technical report trigger to include any first time written disclosure of mineral resources is good.
2. The allowance of 6-month filing delay for a technical report if a pre-existing report by another is good. The nature of consulting today often has QP individuals on a team separated for periods of months because of foreign assignments with other projects and this delay allowance recognizes this reality.
3. The amendments to allow Reliance on Other Experts which allows the QP to rely on and disclaim responsibility for certain information provided by the issuer and pricing and valuation information provided by non-QP individuals. Some of our work is highly confidential or in market places dominated by groups with special proprietary knowledge which is extremely difficult to validate from a consultant's perspective, so we are sometimes forced to accept the expertise that such companies have developed in a narrow segment of the mining industry.
4. Recognition of foreign standards and foreign producers to not require independent qualified persons to prepare technical reports is a realization that some environments that are non-existent in Canada have significant expertise, because of location or climate (i.e., Brazilian iron ore, Guyanese bauxite and lateritic gold deposits in tropical rainforests) – all which may develop and produce under conditions only applicable to their environment.
5. To my knowledge, PAH has not done any short form prospectus offerings so I am not qualified to comment on the need to keep or eliminate the short form prospectus trigger.
6. The replacement of the consent of the firm that employed the qualified person at the date of the signing of the technical report is a definite improvement. Consultants are highly mobile and sought after both by other consultants and mining companies. I have seen people virtually disappear off the face of the earth by taking a new position and they cannot be contacted.
7. I like the requirement for the qualified person to use a seal on the document. I have invested considerable money in seals over the years, but seldomly use them for clients, so it will be good to have to start using them again.
8. The requirement for an issuer to maintain copies of assay and analytical certificates and drill logs etc for a period of 7 years is a minimum requirement. Personally, I believe that drill core that proves a deposit should be kept until the deposit which is represented has been mined. The core could be skeletonized after photographing but we constantly work on projects where the core is more than 30 years old and essential for validation of history and often resource and reserve estimates.

Overall, the CSA and its committee members have done an outstanding job on this revision and I commend all of you for your efforts.

Yours sincerely,

Barton G. Stone
Chief Geologist
Pincock Allen & Holt
165 South Union Blvd, Suite 950
Lakewood, CO 80228-2226
303-914-4476

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