

R E P O R T

O N

MATTERS CONCERNED WITH

THE ADMINISTRATION OF QUARTZ AND PLACER MINING

I N

THE YUKON TERRITORY

by

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Winnipeg, Manitoba,
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TERMS OF REFERENCE - No. 1

HOW SHALL QUARTZ MINING IN THE YUKON BE ADMINISTERED?

- (a) Under a governing statute only, as at present, or
- (b) under regulations entirely, as is presently the case in the Northwest Territories;
- (c) under a governing statute which should provide for regulations in certain matters.

HISTORY OF MINERAL ADMINISTRATION

Before proceeding to the consideration of what should be the character of the measure of administration, it would be well to review the history of the administration of the mineral resources under control of the Government of Canada.

MINERAL REGULATIONS, 1884, 1887, 1898 & 1908

The first regulations to govern the disposal of Dominion Lands containing minerals, other than coal, were approved by order in council in 1884 and amendments were made in 1887. In both cases four-post staking was the method provided. Further amendments made in 1898 were referred to as "Quartz Mining Regulations" in which two-post staking was provided, presumably influenced by the laws of British Columbia. In that year for the first time reference was made to the regulations as governing the disposal of quartz mining claims on Dominion Lands in Manitoba, and the North-West Territories (including the Provisional District of Yukon.) In 1908 the Yukon Territory was mentioned for the first time in the "Regulations for the Disposal of quartz mining claims on Dominion Lands."

IMPROVEMENTS SOUGHT IN MINERAL ADMINISTRATION

As early as 1901 there had been some agitation in British Columbia to allay the ills of the day, said to be, "excessive taxation and oppressive legislation", and in 1904 a writer (Eugene Coste, one of the outstanding mining engineers of his day) in a restrained submission, "Suggested Improvements in the Mining Laws of Canada", asked the question "Are our laws lacking in some essential details? If so, is there any way of betterment."

He offered two suggestions -

1. The necessity for better and continued assessment work
2. The enactment of a "Mines Act" by the Parliament of Canada.

In 1910 a paper presented to the Canadian Institute of Mining and Metallurgy, at Toronto, by H. Mortimer Lamb, secretary of the Institute, "Deficiencies in Canadian Mining Laws - a Plea for Improvement and Unification", suggested that -

1. Titles to mining claims be fixed by statute rather than by order in council.
2. The framing of a Model Act for the Dominion.

It developed at that time that the mining industry considered the laws too complex, the provisions uncertain, lacked clarity, as well as uniformity within a Province and between the Provinces. There was a definite distrust of the order in council. It was contended that the granting of titles by that procedure was aggravating and unsatisfactory. A title not fixed by statute was looked upon as unstable and uncertain.

"THE CANADA MINES ACT. 1912-13"

A draft bill, based on principles advocated by the Institute, was carefully revised and sent to Ottawa but "unfortunately other business deemed to be more pressing was given precedence". However, "The Canada Mines Act" was prepared for the 12th Canadian Parliament - 1912-13. In this proposed Act four-post staking was to be used. Unfortunately too this Act was shelved and had it been passed would have gone a long way to improve conditions in the acquisition and tenure of mineral lands in the Yukon Territory.

The Act applied to the provinces of Manitoba, Saskatchewan and Alberta, the Yukon Territory and the Northwest Territories. Had that Act been passed there would have been no necessity for "The Yukon Quartz Mining Act" enacted in 1924, and which with some amendments has remained in force to this day.

PRESENT DAY MINERAL ADMINISTRATION

As matters stand now the provinces of Manitoba and Saskatchewan and the Northwest Territories are alone in the governing of the disposal of their mineral lands by Regulations under an act. Other provinces however are insistent on having Acts instead of Regulations by orders in council for such disposal. There is in the Yukon an inherent determination that an Act should prevail. While I do not share that feeling with the mining people of the Yukon I am of the opinion that a compromise, mutually satisfactory to the Government of Canada and the people of the Yukon Territory can be devised.

It is my considered opinion that the mining fraternity in the Yukon would be satisfied with an Act and Regulations provided there are safeguards written into the Act to protect them from "the whims and fancies of Ministers or government officials who may desire to slip something over at the instance of the big interests who can get to Ottawa overnight - particularly from Toronto." (The words in quotations were repeated to me over and over again in the Yukon. A comparative stranger is at a disadvantage in allaying fears, fancied or otherwise. Yet it is only fair to the people of the Yukon to add that British Columbia also has the same fear of orders in Council.)

DETAILS AND POLICY

I cited in discussions that some matters should be matters set out by Act, while others would find a better place in regulations.

The administration of mining claims can be handled much better by regulations where matters of detail are concerned. In turn the regulations should be tied to an Act so that parliamentary action would only be required in matters of higher policy.

This calls for some elucidation because of the interrelation of the Terms of Reference Nos. I and II. In a previous paragraph I stated "it is my considered opinion that the Yukon would be satisfied with an Act and Regulations provided there are safeguards written into the Act to protect them."

"What protection does the Yukon prospector desire?" may be asked. Well, the outstanding one at the moment is that against reservations or concessions. And from another side there will come the query "Is the progress of the Yukon to be held back just to meet the fancies of a few prospectors whose efforts, worthy and all as they have been in the past, are outmoded in the light of modern mineral development?"

There are then two problems to be met.

1. Shall the prospectors in the Yukon be protected in an Act, and if so how long? or
2. Has the time come when reservations and concessions should be granted?

I will endeavour to meet these queries in discussing Terms of Reference No. II. There are areas in which "Science will have to come to the aid of the Prospector". That of itself is an admission that a changing situation has come into the field of prospecting. In the newer art of prospecting the work must be taken over by those groups which have the finances to undertake costly exploration.

On the other hand I believe that the day of the Yukon prospectors is not over. However, I recognize that the Government of Canada charged as it is with the administration of the mineral resources in both the Yukon and the Northwest Territories has a duty to perform in getting the best and the most out of these resources. That will demand careful surveillance of the progress or retrogression in the art of prospecting. The time may come when reservations and concessions should be granted in order that the mineral development shall not be held back.

But let me say it is my belief that the hard-working prospector in the Yukon deserves support. There are still the remote areas in the north of the Yukon to be prospected. They are not easy to get at and are costly to explore. They are wide-open for the financial group which has the means to send out scouts.

It may be pointed out here that the large acreages now, desired by base metal operators particularly, have been met by exploration companies in the Yukon without recourse to reservations or concessions.

I THEREFORE RECOMMEND that the rights of the prospector to prospect and stake claims anywhere in the Yukon Territory be protected by statute and that all administrative procedures of such prospecting and staking including the number and size of claims, the method of staking, the use of cairns, the recording of claims, the granting of leases and all other matters connected with the disposal of mining rights should be provided for by regulations.

PLACER MINING

In Terms of Reference- No. I, "Placer Mining" is included in the directive. I deem it advisable to comment on this separately since "Quartz Mining" and "Placer Mining" in the Yukon Territory are now administered under two separate Acts.

At a meeting of the executive of the Dawson City Chamber of Mines, held May 28, I was invited to be present. That meeting was of interest in that the chairman, Mr. A. Baird, chief accountant of the Yukon Consolidated Gold Corporation Limited, was one of the pioneers who came from Australia to the Yukon in 1898. Further there were others present who had been born and lived in Dawson City all their years. There was also one member of the Yukon Territorial Council present, Mr. V. Mellor, and some of the smaller operators on the creeks. It should be borne in mind that the operations of the Yukon Consolidated Gold Corporation Limited greatly overshadow those of the other placer mines in the Yukon today.

The chairman recalled that in 1900 a similar meeting had been held when the late Mr. Justice Britton, Supreme Court of Ontario, came to the Yukon to study placer mining problems. At that time the disposal of placer mining claims was done by Regulations. The Yukon Placer Mining Act was not enacted until years later, i.e. 1906.

The Dawson area placer mining operators are intent on retaining "their Act". They say that "theirs" is the best Act in America and much superior to anything in the adjoining Alaskan Territory.

"Who is behind all these changes", they ask, "when we are well satisfied with what we have?" They talked of some amendment that might be made in section 89, and of a clarification that could be made in section 26.

In view of the harmony that prevails among the placer miners it does not appear to be an opportune time to set about using regulations instead of an Act.

I WOULD THEREFORE SUGGEST THAT any repeal or considerable amendment to the Yukon Placer Mining Act be held in abeyance.

TERMS OF REFERENCE - NO. II

SHOULD THE GOVERNOR IN COUNCIL HAVE THE RIGHT
TO WITHDRAW AREAS FROM ORDINARY STAKING AND
TO GRANT RESERVATIONS OR CONCESSIONS BY PUBLIC
COMPETITION?

AVERSION TO RESERVATIONS

In the matter of granting reservations or concessions by public competition, the opinion expressed throughout my investigation was that of aversion to any such procedure. Nowhere was anyone met who was out-and-out in favour of reservations or concessions at the present time - except in very remote areas.

PROSPECTOR AND COMPANY

Naturally concessions do not appeal to the individual prospector. I may point out here that the Yukon still has many of those intrepid persons who prefer to prospect on a grubstake which financially involves only the contribution of field supplies by a partner who participates with the prospector on a 50-50 basis in any discovery made or claims held.

Neither did I learn that any prospector working for pay and participation in a lesser percentage in any find or claim held, had any desire to see any areas withdrawn from ordinary staking. And considering the present time, for attitudes may change as to exploration programmes, I could not find that any companies operating in the Yukon had opinions

different from those of the prospectors. Rather did it appear that exploration companies were satisfied to rest their chances on their own prospectors but not overlooking dealing with an independent prospector who made a find. It is recognized that most of the recent finds in the Yukon, as well as those of earlier years, were made by individual prospectors working on their own or assisted by a grubstaker. This is not the time to discourage this class of prospector in any way.

PINE POINT CONCESSION

The Pine Point reservation or concession in the Northwest Territories was mentioned by many interviewed. Yet I did not learn of any well considered objection to the arrangement made to deal with the Pine Point mineral deposit. No comparable situation has yet been met within the Yukon.

SCIENCE AND THE PROSPECTOR

In 1938 the "Economic Survey of Manitoba" produced as part of its effort, "The Mineral Resources of Manitoba." The following is quoted as the opinion of one who was known to be well-disposed to the prospector yet mindful of the changing prospecting field -

" In the past great credit has been given to the prospector, the pioneer of the mining industry. His work made possible the industry of today. While it is admitted that the examination of mineral areas is as yet incomplete and to a large degree superficial, signs are not wanting that the discovery of surface outcrops is becoming a more difficult problem than it was. The extent of the mineral regions are fairly well known, in so far as the Precambrian areas are concerned, much of it is covered by overburden and lakes. If these areas are to continue to produce as they have in the past, more discoveries will have to be made and it would appear that in order to do this, science will have to come to the aid of the prospector."

A GEOLOGIST'S OPINION

Having regard to the changing conditions, I now come to an interview with a geologist highly esteemed for his knowledge of and his interest in the Yukon Territory. I value his comments made to me as most authoritative because they are based on geological evaluation. "The time has not yet come when reservations or concessions have any place in the mineral development (hard-rock) of the Yukon, other than for oil or remote areas. Conditions may change but not in the immediate future as the day of the prospector is far from over in the Yukon". This is a summary of his comments.

Let me add that despite the efforts of claim stakers and others who seek real estate of large acreage rather than property that can be developed, the honest hard-working prospector is deserving of continued support as he believes as many other conscientious people do that the Yukon still has finds to be made.

I BELIEVE that a healthy condition exists in the Yukon insofar as the individual prospector is concerned and that the time has not yet come when

"The Governor in Council should be given the right to withdraw areas in the Yukon Territory from ordinary staking or to grant reservations or concessions by public competition."

I would recommend that the granting of reservations or concessions be reviewed if and when conditions change.

TERMS OF REFERENCE - NO. III

TWO AND FOUR POST STAKING. WHICH?

DIVERSE OPINIONS RE STAKING PRESENTED TO ME

This question proved to be the most contentious given to me for investigation. There is a marked division of opinion between the westerners and easterners, as to the merits of the two methods.

TWO-POST STAKING

The two-post method has had years of experience behind it and if one turns to the history of prospecting it will be found that the two-post, or single line, staking was a very realistic procedure in the days when one or two claims were being located by prospectors who lived on their claims and abided faithfully by the requirements of "discovery of valuable mineral in place." The method, it is admitted, was particularly suited to the staking of one or two claims in areas of rugged terrain. And in the placer diggings it has served a useful and effective purpose - and particularly so when guided by a surveyed base line.

Those prospectors who had lived in British Columbia or the Yukon have grown up with two-post staking. Yet it is passing strange that in a terrain as rugged as either British Columbia or the Yukon, Alaska has held to the four-post method - or should it be referred to as "seven-post" for three more posts are required to designate the Location Line.

The westerner views his two-post method with a fervour almost vehement, and one at least has voiced his disregard to an eastern counterpart in the words, "If you don't like two-post staking out here you had better go back east." However an easterner describes it this way, "If a prospector is selling claims that he hasn't got, the two-post staking is wonderful."

FOUR-POST STAKING

Now the eastern exploration and development companies have moved into the Yukon in search of minerals. They are used to the four-line staking which prevails in all parts of Canada east of Alberta. The easterner with the wherewithal to carry on exploration and development is sensitive of the fact that the four-post staking has merits that the westerner fails to appreciate. The method gives better definition to the location of the claim, for his company wants to know where the claims are and what are their boundaries.

The easterner says, "If a claim is worth staking it is worth putting in four posts". Another easterner in remarking that two-post staking creates fractions and confusion, adds, "The Yukon is fraction conscious". And it is well known that even simple fractions may have a nuisance complex.

MODERN TRENDS

Such is the situation in the Yukon. And in spite of diversity of opinion it has become apparent today that the trend is towards larger claim groups, based either on their location in respect to known discoveries or upon their chances as geological or geophysical "bets".

The acquisition of mining claims has, however, undergone many modifications since the introduction of two-post staking. It is now generally agreed that the more obvious mineral exposures have received more than a preliminary glance in most areas of Canada. Hence the opportunity presented to any single individual of making a "discovery in place" is becoming more and more unlikely. Mining companies without exception today look for areas comprising many claims on which to undertake geological or geophysical work prior to diamond drilling in the hope of locating ore deposits that may be buried beneath lakes, muskog, glacial debris or, in some instances, an overlying veneer of younger consolidated rocks.

There is also a trend expressed in some Provincial Acts of acquiring concessions in remote areas by a licence fee accompanied by a guarantee of work in the form of a refundable bond. All of which leads to the question "Should the Yukon Territory change from the two-post to the four-post method of staking claims?"

COMPARISON OF TWO-POST AND FOUR-POST STAKING

Attention has already been directed to the fact that the money for exploration and development is coming from outside and particularly from the east. What are the points of contention that eastern interests desire to have settled? They feel that the four-post staking offers a measure of security of tenure that is lacking in the two-post staking. It is reasonable then for the interests putting up the money to ask the people of the Yukon to co-operate in this regard. To that end it would be advisable to set out the Pros and Cons of the two staking methods in the hope that and understanding may be reached amicably.

THE TWO-POST METHOD

PRO:

1. It is easy and simple
2. It is quick and adaptable to a rugged country

3. It has been used for many years
4. It is readily understood by the less than average prospector.

CON:

1. It creates fractions X
2. Leads to confusion by overlapping of stakings
3. Lacks definition and accentuates uncertainty
4. No guarantee that a mineral occurrence will be adequately covered by this method of staking
5. Requires great skill to stake accurately although on the face it appears simple. - Competent persons advise that they can stake without having fractions. Can the average prospector be entrusted to do likewise?
6. Ineffective in a staking rush.
7. Makes the preliminary keeping of adequate plans in the Mining Recorder's office a virtual impossibility.
8. How can a prospector tell that he is doing representation work on his own ground? If so, why is subsection 2 of section 54 necessary?
9. Purchasers of a claim are becoming more reluctant to make deals without knowing something real about the boundaries.
10. Difficult to pin down offenders against the staking regulations. It is easy for the offender to say "I didn't know I was on the other fellow's claim."

X In the matter of creating fractions, considered a weakness of the two-post method of staking claims, attention is directed to a glaring inconsistency in the Yukon Quartz Mining Act. The maximum area of a claim is set by section 20 (3), or section 84 at 51.65 acres, yet provision is made by section 82 to include a fraction within the claim and further by section 83 - a Dominion Land Surveyor may, in surveying a fractional claim, do so to contain all unoccupied ground lying between the previously located claims making for an acreage in either case of 60 acres. This is contrary to the spirit of two-post staking which seeks to hold a claim to a maximum of 51.65 acres. What happens when the acreage is over 60? Is there still a fraction left?

FOUR-POST STAKING

PRO:

1. Makes for definition and avoids confusion even before a claim is actually surveyed.

2. Reduces fractions to a minimum
3. Provides a prospector who follows after an original discovery or a previous staking, with information by which he can better locate his claim.
4. Makes for better preliminary mapping of the location of a claim in the Recorder's office
5. The purchaser of a claim has a very fair idea of the boundaries of the claim.
6. Makes for uniformity with another Territory administered by the Government of Canada - which seems desirable regardless of the difference of their terrain.

CON:

1. Takes longer to stake than with the two-post method
2. Is inconvenient in rugged terrain.

In the final analysis the strongest argument used in favour of two-post staking is that it is better adapted to the rugged western terrain. In fact it is about the only reasonable argument offered. That it is easy, simple and quick is hardly acceptable where a matter of acquiring title to mineral land is involved. And with changing conditions in the acquisition of mineral claims the fact that the two-post method has been used for years does not measure up to modern needs. Nor is the four-post staking any more difficult to understand than the two-post method although it must be admitted that it demands more work. All of which prompts the inclusion of a question asked by a prospector -

"Do you want to do it right, or do you want to do it easy?"

I AM OF THE OPINION THAT four-post staking can be and should be used in the Yukon Territory despite the many areas of rugged terrain.

I AM CONVINCED FURTHER THAT if the prospecting fraternity of the Yukon accept the four-post staking as an endeavour to improve the prospector-purchaser relations in their Territory, it should stimulate the interest of those financially able to develop the mineral resources of the Yukon, to the mutual advantage of all concerned.

The present Yukon Quartz Mining Act, section 26, has provisions for the staking out of a claim "in case it is found impossible, owing to the presence of water or other unsurmountable obstacle to set Post No. 2 in its proper position, etc. "

I AM CONFIDENT if study be made of this provision for witness posts then an effective plan can be devised for four-post staking.

However, some suggestion has been made that the two-post staking could be used in some areas and the four-post in others. This would not be a compromise, rather would it lead to more confusion.

IN MY OPINION it is one method or the other, and I have expressed myself as being in favour of four-post staking.

TERMS OF REFERENCE - No. IV

SHOULD THERE BE A TIME LIMIT WITHIN WHICH
A CLAIM HOLDER MUST ARRANGE FOR THE SURVEY
OF HIS CLAIM AND WHETHER UNDER THE PRESENT
REGULATIONS THE MINISTER IS JUSTIFIED IN
DEMANDING THAT THE UNSURVEYED CLAIMS SHOULD
BE SURVEYED WITHIN A REASONABLE TIME, SAY
WITHIN ONE OR TWO YEARS?

The matter of the survey of a claim is dealt with in Section 79-87 of "The Yukon Quartz Mining Act". Section 79 provides that a survey of a claim shall be made within one year of notice from the Minister to do so but that such notice shall not be given until one year after the claim is recorded. In other words the claim holder would have at least two years in which to have a survey made.

It would have been advisable to have ordered surveys when Dominion Land Surveyors were more readily available than they are now. In recent years it would have been all but impossible to find such surveyors had the Minister ordered the surveys. With the two-post method of staking it would have served a very useful purpose had such an order been enforced by the Minister some years ago.

The province of British Columbia which operates under the two-post method of staking does not appear to have a provision in its "Mineral Act" similar to that of section 79 in the Yukon Quartz Mining Act. However, the holder of a claim in British Columbia cannot obtain a certificate of improvements leading up to a Crown Grant until he has had the claim surveyed by an authorized land surveyor.

I AM OF THE OPINION THAT the Minister should have the right to demand that an unsurveyed claim be surveyed within a reasonable time - depending on the circumstances that may arise.

TERMS OF REFERENCE - NO. V

SHOULD A CLAIM HOLDER BE COMPELLED
TO TAKE OUT A LEASE WITHIN A CERTAIN
PERIOD OF TIME?

Perusal of the Yukon Quartz Mining Act. chap. 301, R.S.1952, with particular reference to section 49 (chattel interest), 53 (representation work or payment in lieu thereof) and 63 and 64 (title), does not reveal that a lease must be taken out within a certain time. Yet there may be an implication despite the wording with regard to representation work, in section 53 (1), " .. and during such year and each succeeding year such locator shall do work to the value of one hundred dollars ...," and that the term of such work is limited to five years if reference be made to the Act to the payment of either \$400 (sec. 53 (1)) or \$500 (sec. 63 (1)) and (sec. 64 (1)).

In direction the Yukon Act follows that of "The Mineral Act of British Columbia". I would at this point make some comments on the situation existing in other provinces by way of comparison with that of British Columbia and the Yukon Territory.

LIMITS OF HOLDING CLAIMS BEFORE LEASE OR PATENT

If examination be made of the Acts and Regulations in force in Ontario, Manitoba and Saskatchewan, it will be found that a limit of five years after the recording of a claim is set for the taking out of a patent or lease, as the case may be. This limit, it may be said, has not met with much, if any, objection.

HOW CLAIMS ARE ACQUIRED IN QUEBEC

By way of further comparison attention is directed to the method of acquiring claims in Quebec. This, while different from the other provinces

cited, is restrictive as to the time of holding a claim before patent (or lease in some cases). Briefly, Quebec requires first of all that a prospecting licence be taken out - charge \$10 - good for one year. If at the expiry of that time the holder desires to continue holding the claim he must take out a development licence - charge \$10 - and pay rental of \$10 to \$20 a year depending on the distance of the claim from the mining recorder's office - over or under 100 miles.

Following a period of development, dependent on the wish of the holder, a patent (or lease) may be applied for but is granted only if the holder has proved that on the claim there exists a mineral deposit of economic value which can be brought into production. This Quebec method has its merits and even in spite of its cost has proved satisfactory to the Province's Department of Mines.

LONG YEARS OF CLAIM HOLDING BEFORE LEASE IN THE YUKON

Coming then to the consideration of the situation in the Yukon Territory, I learned (and that with surprise) that claims have been held there for as many as thirty years by the performance of representation work. Some of those claims have been surveyed, others have not, but leases have not been applied for. (It should be mentioned in passing that there are claims held by patent in the Yukon and taxes are collected. Some claims have been cancelled for non-payment of taxes. Attention is directed to the fact that patents for mineral claims issued under the provisions of the Dominion Lands Act gave way to leases at June 12, 1914).

DOUBT AS TO PERFORMANCE OF WORK

From information ventured to me, I may say that it is doubtful in some cases in the Yukon Territory whether work sworn in has actually been performed. No concerted effort has ever been made to inspect representation work nor can the mining recorders be expected to make inspections except in extraordinary cases.

LONG TERM BEFORE LEASING NOT FAVOURED

Following careful enquiry in the Yukon Territory I did not meet many people (interested in mining) who favoured a long period of holding a claim

by virtue of work or payment in lieu thereof. The general feeling that I sensed from interviews was - and in this I concur - that a reasonable time should be allowed to prove up a claim before taking out a lease.

OLD TIME PROSPECTORS

Information given to me showed that some old-time prospectors in the Yukon Territory had held claims for many years and in the end had been able to dispose of them for worthwhile considerations. A good prospector will work on his claims, for he is a man of peculiar yet commendable faith. There are others, however, not so good who find it easier to sign an affidavit than to do hard work. And unless the Government is prepared to have regular inspections made of claims for which work has been sworn in, the situation for non-performance of work will not be corrected. In order to know that the provisions of its Mineral Act are being observed, the British Columbia Department of Mines is now carrying out spot inspections to verify whether or not work has actually been done. This should have a salutary effect.

Having regard then to the practices prevailing in British Columbia, Saskatchewan, Manitoba, Ontario and Quebec, and having learned the views of many persons in the Yukon Territory -

I SHALL NOW STATE AS MY CONSIDERED OPINION -

That a claim holder should be compelled to take out a lease within a reasonable period of time.

Just what length of time that period should be may require some study.

It will call for

1. Consideration of the remoteness of the Yukon Territory
2. No imposition of conditions inimical to the best interests of the prospecting fraternity
3. An appreciation that the mining industry should be afforded every opportunity to perform its function in the field of exploration and development.

MAY I THEREFORE SUGGEST THAT

A limit of ten years after the recording of a claim be set as that at which a claim holder should take out a lease.

And in order that those presently holding claims may be brought to comply with a time limit, such as may be applied to future claim holders, I WOULD SUGGEST FURTHER THAT -

Present claim holders be given a period of ten years - from, say July 1, 1954 (or such other date as may be found advisable), to take out leases so that all claim holders may be on the same time basis.

"No one should tie up mineral properties indefinitely", was a statement made many years ago when the question of title, whether patent or lease, was being studied. The leasehold does endeavour to correct the "indefinitely".

(sgd). George E. Cole, P.Eng.