



ENDEAVOUR FINANCIAL

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Vancouver, July 23, 2010

British Columbia Securities Commission
Alberta Securities Commission
Saskatchewan Financial Services Commission – Securities Division
Manitoba Securities Commission
Ontario Securities Commission
Autorité des marchés financiers
New Brunswick Securities Commission
Registrar of Securities, Prince Edward Island
Nova Scotia Securities Commission
Securities Commission of Newfoundland and Labrador
Superintendent of Securities, Northwest Territories
Superintendent of Securities, Yukon Territory
Superintendent of Securities, Nunavut

Attention:

Sheryl Thomson
Senior Legal Counsel, British Columbia Securities Commission
PO Box 10142 Pacific Centre
701 West Georgia Street
Vancouver, BC V7Y 1L2

And

Anne-Marie Beaudoin
Corporate Finance Corporate Secretary
Autorité des marchés financiers
800, square Victoria, 22e étage
C.P. 246, tour de la Bourse
Montréal, Québec H4Z 1G3

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

Dear Sirs:

We have reviewed the Proposed Repeal and Replacement of National Instrument 43-101 *Standards of Disclosure for Mineral Projects*, Form 43-101F1 *Technical Report*, and Companion Policy 43-101CP and offer the following comment:

Endeavour Financial International Corporation

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We are in agreement with the proposed Amended Mining Rule and the Consequential Amendments and view these changes as positive enhancements. In addition, we offer the following answers to the specific questions posed:

Short form prospectus trigger

1. Do you rely on technical reports when making, or advising on, investment decisions in a short form prospectus offering? If yes, please explain how the content of a technical report, or the certification of a technical report by a qualified person, could influence your investment decisions or your recommendations.

No

2. Do you think we should keep, or eliminate, the short form prospectus trigger? Please explain your reasoning.

The short form prospectus trigger should be eliminated. This is based on the view that the required process of Continuous Disclosure adequately covers the disclosure needs under these circumstances. In addition, the elimination of the triggers reduces costs, and more importantly, assists in reducing delays.

3. Please discuss how your answers to questions 1 and 2 might change in each of the three cases described in the table.

No change.

4. If we decide to eliminate the short form prospectus trigger, is the proposed guidance in subsection 4.2(13) of the Amended Companion Policy useful? Do you have any suggestions concerning this guidance?

The guidance is useful and we do not suggest any changes.

New exemption for property acquisition with current technical report

5. Is the proposed new exemption relating to an acquired property helpful? Is it reasonable to expect that issuers will use the new exemption in light of the attached conditions?

We believe that the exemption is helpful and that it is reasonable to expect issuers to use the new exemption in light of the attached conditions.

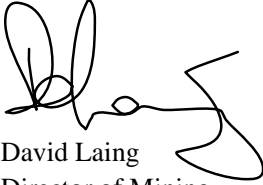
Existing exemption from site visit requirement

6. Do market participants use this exemption? Should we keep it in the Amended Instrument?

We note that in our experience this exemption is rarely used. We also believe that it should be kept in the Amended Instrument.

We appreciate the opportunity to participate in this Request for Comment.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'David Laing', with a stylized flourish extending to the right.

David Laing
Director of Mining
Endeavour Financial

Cc Gord Keep, Fiore Corporation
Doug Reddy, Endeavour Financial