



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

January 23, 2012

Via E-mail

D. Bruce McLeod
President and Chief Executive Officer
Mercator Minerals Ltd.
1050-625 Howe Street
Vancouver, British Columbia, Canada V6C 2T6

**Re: Mercator Minerals Ltd.
Registration Statement on Form 40-FR12G
Filed November 8, 2011
File No. 000-54543**

Dear Mr. McLeod:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ John Reynolds

John Reynolds
Assistant Director