Mr. Thomas A. Janochoski Chief Financial Officer Great Northern Iron Ore Properties W-1290 First National Bank Building 332 Minnesota Street Saint Paul, Minnesota 55101

Re: Great Northern Iron Ore Properties
Form 10-K for Fiscal Year Ended December 31, 2004
Filed February 25, 2005
File No. 001-00701

Dear Mr. Janochoski :

We have completed our review of your Form  $10\mbox{-}\mbox{K}$  and related filings and have no further comments at this time.

Sincerely,

H. Roger Schwall Assistant Director