



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
**SECURITIES AND EXCHANGE COMMISSION**  
WASHINGTON, D.C. 20549-0402

Mail Stop 3561

December 23, 2008

Ultrapetrol (Bahamas) Limited  
Leonard J. Hoskinson - Chief Financial Officer, Secretary, Director  
H&J Corporate Services Ltd.  
Ocean Centre, Montagu Foreshore  
East Bay St.  
Nassau, Bahamas  
P.O. Box SS-19084

**Re: Ultrapetrol (Bahamas) Limited**  
**Form 20-F the year ended December 31, 2007**  
**Filed March 13, 2008**  
**File Number: 001-33068**

Dear Mr. Hoskinson:

We have completed our review of your Form 20-F, and related filings and do not, at this time, have any further comments.

Sincerely,

David R. Humphrey  
Branch Chief