



DIVISION OF
CORPORATION FINANCE

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

November 12, 2010

Jan Telander
Progreen Properties, Inc.
380 North Old Woodward Avenue
Suite 226
Birmingham, MI 48009

Re: Progreen Properties, Inc.
Form 10-K for the Fiscal Year Ended April 30, 2010
File No. 000-25429

Dear Mr. Telander:

We have completed our review of your filing and do not have any further comments at this time.

Sincerely,

Cicely LaMothe
Accounting Branch Chief