

Via Facsimile and U.S. Mail  
Mail Stop 6010

February 24, 2009

Jay S. Bullock  
Chief Financial Officer  
Argo Group International Holdings, Ltd.  
110 Pitts Bay Road  
Pembroke HM 08 Bermuda

**Re: Argo Group International Holdings, Ltd.**  
**Form 10-K for the Fiscal Year Ended December 31, 2007**  
**File Number: 001-15259**

Dear Mr. Bullock,

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

Sincerely,

Carlton E. Tartar  
Accounting Branch Chief