Mail Stop 3561

November 10, 2005

James Wall Chief Financial Officer Core-Mark Holding Company, Inc. 395 Oyster Point Boulevard, Suite 415 South San Francisco, California 94080

Re: Core-Mark Holding Company, Inc. Registration Statement on Form 10 Filed September 6, 2005 File No. 0-51515

Dear Mr. Wall:

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

Sincerely,

H. Christopher Owings Assistant Director

cc: Ryan Gallagher, Esq. Fax: (650) 802-3100