



DIVISION OF  
CORPORATION FINANCE  
MAIL STOP 7010

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549-7010

November 20, 2008

Mr. Thomas J. Hollister  
Chief Financial Officer  
Global Partners LP  
800 South Street, P.O. Box 9161  
Waltham, MA 02454

**Re: Global Partners LP**  
**Form 10-K for Fiscal Year Ended December 31, 2007**  
**File No. 001-32593**

Dear Mr. Hollister:

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

Sincerely,

H. Roger Schwall  
Assistant Director