



DIVISION OF  
CORPORATION FINANCE

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

July 7, 2009

By Facsimile and U.S. Mail

Mr. Massimiliano Pozzoni  
Chief Financial Officer  
Cobra Oil & Gas Company  
Uptown Center, 2100 North Loop South  
Suite 400  
Houston, Texas 77002

**Re:Cobra Oil & Gas Company**  
**Form 10-KSB for the Fiscal Year Ended May 31, 2008**  
**Filed August 15, 2008**  
**Response Letter Dated June 9, 2009**  
**File No. 000-52788**

Dear Mr. Pozzoni:

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

Sincerely,

Jill Davis  
Branch Chief