



DIVISION OF
CORPORATION FINANCE

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

February 17, 2008

Mr. Manjeet Dhillon
Chief Financial Officer
Challenger Energy Corp.
Suite 200, 744 – 4th Ave. S.W.
Calgary, Alberta Canada

**Re: Challenger Energy Corp.
Form 20-F/A for Fiscal Year Ended December 31, 2007
Filed January 22, 2009
Response Letter Dated January 22, 2009
File No. 1-33275**

Dear Mr. Dhillon:

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

Sincerely,

Jill S. Davis
Branch Chief