

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

March 13, 2025

Koh Kuan Hua Chief Executive Officer Uni-Fuels Holdings Ltd 15 Beach Road, Beach Centre #05-07 Singapore 189677

> Re: Uni-Fuels Holdings Ltd Draft Registration Statement on Form F-1 Submitted March 7, 2025 CIK No. 0002021688

Dear Koh Kuan Hua:

This is to advise you that we do not intend to review your registration statement.

We request that you publicly file your registration statement no later than 48 hours prior to the requested effective date and time. Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Kate Beukenkamp at 202-551-3861 with any questions.

Sincerely,

Division of Corporation Finance Office of Trade & Services

cc: Lawrence S. Venick