## DIVISION OF CORPORATION FINANCE MAIL STOP 7010

## UNITED STATES SECURITIES AND EXCHANGE COMMISSION

100 F Street, N.E. WASHINGTON, D.C. 20549-7010

October 19, 2006

Mr. Haim Tsuff Chief Executive Officer Isramco Inc. 11767 Katy Freeway Houston, Texas 77079

**Re:** Isramco Inc.

Form 10-K for Fiscal Year Ended December 31, 2005

Filed March 24, 2006 File No. 0- 12500

Dear Mr. Tsuff:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments.

Sincerely,

April Sifford Branch Chief