

Via Facsimile and U.S. Mail  
Mail Stop 6010

December 27, 2006

Mr. Mark W. Haushill  
Senior Vice President, Chief Financial Officer  
and Treasurer  
Argonaut Group, Inc.  
10101 Reunion Place, Suite 500  
San Antonio, TX 78216

**Re: Form 10-K for the Fiscal Year Ended December 31, 2005**  
**Filed March 15, 2006**  
**File No. 000-14950**

Dear Mr. Haushill,

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

Sincerely,

Joseph J. Roesler  
Accounting Branch Chief