



DIVISION OF  
CORPORATION FINANCE

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

October 31, 2011

Via E-mail

Mr. Ang Kang Han  
Sooner Holdings, Inc.  
Long Shan Development Area  
Han Jiang Town, ShiShi City  
Fujian PRC

**Re: Sooner Holdings, Inc.  
Form 8-K  
Filed February 14, 2011  
Form 10-K For Fiscal Year Ended  
September 30, 2010  
Filed December 23, 2010  
File No. 000-18344**

Dear Mr. Ang:

We have completed our review of your filings. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ John Reynolds

John Reynolds  
Assistant Director