



DIVISION OF
CORPORATION FINANCE
MAIL STOP 7010

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

February 17, 2006

Mr. Matt Wayrynen
President, Chief Executive and Financial Officer
Berkley Resources, Inc.
455 Granville Street, Suite 400
Vancouver, British Columbia V6C 1T1

Re: Berkley Resources, Inc.
Form 20-F for the Fiscal Year Ended December 31, 2004
Filed July 1, 2005
File No. 000-18939

Dear Mr. Wayrynen:

We have completed our review of your 2004 Form 20-F, and do not, at this time, have any further comments.

Sincerely,

Karl Hiller
Branch Chief