

Allen & Gledhill

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OUR REF : CTJKOH/ZAR/MFRX/2008010096
YOUR REF : -

14 December 2009

Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Attn: Michele Anderson, Esq., Chief
Christina Chalk, Esq. Senior Special Counsel
Mellissa Campbell Duru, Esq., Special Counsel
Office of Mergers and Acquisitions,
Division of Corporation Finance

Attn: Josephine J. Tao, Esq., Assistant Director
Division of Trading and Markets

Dear Sirs

TENDER OFFER FOR SHARES OF CHEMOIL ENERGY LIMITED

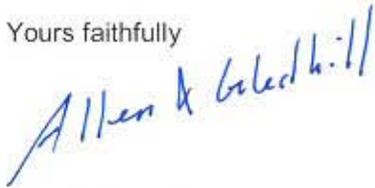
1. We refer to the letter dated 14 December 2009 (the "**Letter**") from Valarie A. Hing, a partner at the firm of Curtis, Mallet-Prevost, Colt & Mosle LLP ("**Curtis**"), writing to you on behalf of our client, Glencore International AG ("**Glencore**").
2. In the Letter, Curtis, on behalf of Singfuel Investment Pte. Ltd. ("**Singfuel**"), a Singapore company wholly-owned by Glencore, respectfully requested that the Staff grant no action relief and exemptive relief under certain provision of the U.S. securities laws in connection with its cash tender offer (the "**Offer**") for ordinary shares (the "**Shares**") of Chemoil Energy Limited (the "**Company**"), a company incorporated in Hong Kong and listed on the Singapore Exchange Securities Trading Limited. Singfuel is required to make the Offer to acquire all remaining outstanding Shares, upon the consummation of Singfuel's acquisition of a majority of the outstanding Shares from the holder thereof (the "**Majority Shareholder**") pursuant to a share purchase agreement between Singfuel and the Majority Shareholder.
3. The Letter has also made reference to the reliance by Curtis on the advice of Allen & Gledhill LLP in respect of the laws of the Republic of Singapore.

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4. This letter is rendered at your request solely in connection with the Letter and is limited to matters of Singapore law and practice. This letter is provided incidentally to, and in the ordinary course of, our practice of Singapore law in Singapore, and does not purport to cover any aspects of U.S. law and without prejudice to our status as a "non-appearing foreign attorney" for the purposes of SEC rules and practice.
5. We hereby acknowledge that we have been and are Singapore counsel to Glencore in connection with the Offer and that the references in the Letter to the applicable Singapore law, rules and regulations and Singapore tender offer practice and mechanics are based on discussions between Curtis and Allen & Gledhill LLP. We have reviewed the Letter and we believe the descriptions of the applicable Singapore law, rules and regulations and Singapore tender offer practice and mechanics therein are accurate, and, in our view, complete for the purposes of the Letter. The statements of Singapore legal and regulatory requirements and practice contained in the Letter consist of summaries of the relevant matters of Singapore law, rules and regulations and, as the case may be, practice and should not be construed as a comprehensive description of all issues under Singapore law, rules, regulations and practice.
6. Please do not hesitate to contact us if we can be of any further assistance or if you have any further questions.

Yours faithfully



Allen & Gledhill LLP