



DIVISION OF
CORPORATION FINANCE

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

October 21, 2009

Mr. Hector Francisco Vasquez Davis
President
Pana-Minerales S.A.
Primea Calle El Carmen, EDF, PH Villa Medici, Apt. 28
Torre C, Panama
Republic of Panama

Re: Pana-Minerales S.A.
Form 8-K Filed September 1, 2009
Form 8-K/A Filed October 21, 2009
File No. 000-53700

Dear Mr. Davis:

We have completed our review of your Form 8-K filed September 1, 2009 and related filings and have no further comments at this time.

Sincerely,

Mark C. Shannon
Branch Chief