



DIVISION OF  
CORPORATION FINANCE

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

February 25, 2021

John R. Van Kirk  
Managing Director and Principal Accounting Officer  
North European Oil Royalty Trust  
5 N. Lincoln Street  
Keene, N.H. 03431

**Re: North European Oil Royalty Trust**  
**Form 10-K/A for fiscal year ended October 31, 2020**  
**Filed on February 24, 2021**  
**File No. 001-08245**

Dear Mr. Van Kirk:

We have reviewed your February 24, 2021 response to our comment letter and have the following comment. In our comment, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to this comment within ten business days by providing the requested information or advise us as soon as possible when you will respond. If you do not believe our comment applies to your facts and circumstances, please tell us why in your response.

After reviewing your response to this comment, we may have additional comments. Unless we note otherwise, our reference to prior comment is to the comment in our February 17, 2021 letter.

FORM 10-K/A FILED ON FEBRUARY 24, 2021

Report Of Independent Registered Public Accounting Firm, page F-1

1. We have reviewed your amended filing and note you have only included the revised audit opinion within your amendment. The amendment must contain the complete text of the item being amended. Because the financial statements and auditor's report are filed under one item in a Form 10-K, please revise further to include Item 8 in its entirety.

You may contact Peter McPhun at 202-551-3581 or Wilson Lee at 202-551-3468 if you have questions regarding our comment on the financial statements and related matters.

John R. Van Kirk  
North European Oil Royalty Trust  
February 25, 2021  
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Sincerely,

Division of Corporation Finance  
Office of Real Estate & Construction