

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

DIVISION OF CORPORATION FINANCE

March 1, 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 for fiscal year ended October 31, 2020 Filed on December 30, 2020 File No. 001-08245

Dear Mr. Van Kirk:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance Office of Real Estate & Construction