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August 9, 2018

OTC Markets Group, Inc.
304 Hudson Street, 2nd Floor
New York, New York 10013

Re: Honsen Energy & Resources International Limited

Ladies and Gentlemen:

Our firm serves as regular disclosure and corporate securities counsel to Honsen Energy & Resources International Limited (the "Issuer") and have been asked to render this opinion with respect to the adequacy of the current information contained in the Issuer's Annual Report (the "Annual Report") for the year ended December 31, 2017 and Quarterly Report ("Quarterly Report") for the calendar ended March 31, 2018 posted on the OTC Disclosure & News Service on March 19, 2018 and April 12, 2018, respectively. We have been asked to express our opinion as to the adequacy of the Annual Report within the meaning of Rule 144(c)(2) promulgated under the Securities Act of 1933 ("Act"). The undersigned attorney is a resident of the United States.

OTC Markets Group, Inc. ("OTC Markets") may rely on this opinion in determining whether the Issuer has made adequate current information publicly available within the meaning of Rule 144(c)(2) of the Act.

We have examined such corporate records and other documents and such questions of law as we have deemed necessary or appropriate for purposes of rendering this opinion. As to matters of fact, we have made such inquiries of the Issuer's sole director and officers as we deemed necessary to render this opinion, and we believe that such sources were reliable.

The person responsible for the preparation of the unaudited financial statements contained in the Annual Report and Quarterly Report is Mr. Xing Xing Liu, the Issuer's chief financial officer and qualified accounting officer.

The Issuer's transfer agent is Securities Transfer Corporation. ("Transfer Agent"). The Transfer Agent is registered with the SEC as such under the Securities Exchange Act ("Exchange Act"). By examination of the unaudited financial statements for the quarter ending March 31, 2018, we have determined the number of outstanding shares of the Issuer to be 203,925,366 shares as of April 7, 2018.

The undersigned attorney has (a) personally communicated by telephone with management and sole director of the Issuer, (b) reviewed the Annual Report posted by the Issuer on the OTC Disclosure & News Service, and (c) discussed the Annual Report with the sole director.

To our knowledge, after inquiry of management and a majority of the directors of the Issuer, the Issuer, no holder of five percent (5%) or more of its securities, nor the Issuer's counsel, is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws.

As a result of the foregoing, we are of the opinion that:

1. The Annual Report constitutes "adequate current public information" concerning the Issuer's securities and the Issuer within the meaning of Rule 144(c)(2).

2. The Annual Report is "available" within the meaning of Rule 144(c)(2).

3. The Annual Report includes all of the information that a broker-dealer would be required to obtain from the Issuer to publish a quotation for the Issuer's securities under Rule 15c2-11 under the Exchange Act.

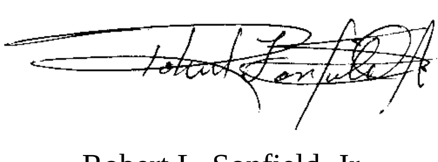
4. The Annual Report complies as to form with OTC Markets' Guidelines for Providing Adequate Current Annual Report.

5. The Annual Report has been posted through the OTC Disclosure & News Service. The undersigned attorney is admitted to practice law in the State of Texas, and this opinion is limited solely to the laws of the United States of America. The undersigned attorney is permitted to practice before the Securities and Exchange Commission ("SEC") and has not been prohibited from such practice.

The opinions set forth herein are expressed as of the date hereof and remain valid so long as the documents, instruments, records and certificates I have examined and relied upon as noted above, are unchanged and the assumptions I have made, as noted above, are valid.

This opinion is rendered solely to OTC Markets and no person other than OTC Markets is entitled to rely upon it. However, we grant OTC Markets full and complete permission and rights to publish this opinion through the OTC Disclosure & News Service for viewing by the public and regulators.

Very truly yours,



Robert L. Sonfield, Jr.
Managing Director