



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549-0405

Mail Stop 3561

November 25, 2008

By U.S. Mail

Mr. Robert Baca
Chief Executive Officer
Sovereign Exploration Associates International, Inc.
503 Washington Avenue, Suite 2D
Newtown, PA 18940

**Re: Sovereign Exploration Associates International, Inc.
Item 4.02 Form 8-K
Filed November 6, 2008
File No. 333-29903**

Dear Mr. Baca:

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

Sincerely,

Andrew Mew
Accounting Branch Chief