



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549-4628

June 16, 2010

Via U.S. Mail

Mr. John T. Drexler  
Senior Vice President and Chief Financial Officer  
Arch Coal, Inc.  
One City Place Drive, Suite 300  
St. Louis, Missouri 63141

**Re: Arch Coal, Inc.**  
**Form 10-K for the Fiscal Year Ended December 31, 2009**  
**Filed March 1, 2010**  
**File Number 1-13105**

Dear Mr. Drexler:

We have completed our review of your Form 10-K and related filings and have no further comments at this time.

Sincerely,

H. Roger Schwall  
Assistant Director