



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549-7010

October 30, 2008

Room 7010

F. George Orr  
Chief Financial Officer, Secretary and Director  
Valcent Products Inc.  
Suite 1010- 789 West Pender Street, Vancouver  
British Columbia V6C 1H2

**Re: Valcent Products Inc.**  
**Form 20-F for Fiscal Year Ended March 31, 2007**  
**File No. 000-30858**

Dear Mr. Orr:

We have completed our review of your Form 20-F and related filings and have no further comments at this time.

Sincerely,

Terence O'Brien  
Branch Chief

CC: Peter F. Waltz  
(303)796-2777