



DIVISION OF
CORPORATION FINANCE
MAIL STOP 7010

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

January 13, 2009

By Facsimile and U.S. Mail

Mr. Phillip W. Terry
Chief Executive Officer
Arena Resources, Inc
6555 S. Lewis Ave.
Tulsa, Oklahoma 74136

Re: Arena Resources, Inc
Form 10-K for the Fiscal Year Ended December 31, 2007
Filed March 12, 2008
Response Letter Dated August 1, 2008
Response Letter Dated November 25, 2008
File No. 001-31657

Dear Mr. Terry:

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

Sincerely,

Jill Davis
Branch Chief