



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, DC 20549-4628

February 22, 2010

Via U.S. Mail

William R. Broaddrick  
Chief Financial Officer  
Arena Resources, Inc.  
6555 South Lewis Avenue  
Tulsa, Oklahoma 74136

**Re: Arena Resources, Inc.**  
**Form 10-K for the Fiscal Year Ended December 31, 2008**  
**Filed March 2, 2009**  
**Response Letter Dated January 8, 2010**  
**File No. 001-31657**

Dear Mr. Broaddrick:

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