



DIVISION OF
CORPORATION FINANCE

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

November 17, 2005

via U.S. Mail

Paul G. Laird
President
New Frontier Energy, Inc.
5632 South Spotswood Street
Littleton, CO 80120

Re: New Frontier Energy, Inc.
Amendment No. 1 to Form SB-2 filed November 4, 2005
File No. 333-128603

Form 10-KSB for the year ended February 28, 2005
Filed August 2, 2005
File No. 0-9435

Dear Mr. Reaves:

We have limited our review of the above filing to only the areas upon which we have issued comments. Where indicated, we think you should revise your document in response to these comments. If you disagree, we will consider your explanation as to why our comment is inapplicable or a revision is unnecessary. Please be as detailed as necessary in your explanation. In some of our comments, we may ask you to provide us with supplemental information so we may better understand your disclosure. After reviewing this information, we may or may not raise additional comments.

Please understand that the purpose of our review process is to assist you in your compliance with the applicable disclosure requirements and to enhance the overall disclosure in your filings. We look forward to working with you in these respects. We welcome any questions you may have about our comments or on any other aspect of our review. Feel free to call us at the telephone numbers listed at the end of this letter.

Form SB-2

Selling Shareholders, page 54

1. We note your response and that "Westminster Securities Corp and Vfinance Investments, Inc. are registered broker-dealers." Your current disclosure states that these parties may be deemed underwriters. Please identify these parties as underwriters.

2. Please disclose the natural persons or advisors who exercise voting and/or dispositive powers for Wellington Management Company, LLP.

Closing Comments

Please amend the above filings in response to these comments. You may wish to provide us with marked copies of the amendments to expedite our review. Please furnish a cover letter with your amendments that keys your responses to our comments and provides any requested supplemental information. Detailed cover letters greatly facilitate our review. Please file your cover letter on EDGAR. Please understand that we may have additional comments after reviewing your amendments and responses to our comments.

We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings reviewed by the staff to be certain that they have provided all information investors require for an informed decision. Since the company and its management are in possession of all facts relating to a company's disclosure, they are responsible for the accuracy and adequacy of the disclosures they have made.

Notwithstanding our comments, in the event the company requests acceleration of the effective date of the pending registration statement, it should furnish a letter, at the time of such request, acknowledging that

- should the Commission or the staff, acting pursuant to delegated authority, declare the filing effective, it does not foreclose the Commission from taking any action with respect to the filing;
- the action of the Commission or the staff, acting pursuant to delegated authority, in declaring the filing effective, does not relieve the company from its full responsibility for the adequacy and accuracy of the disclosure in the filing; and
- the company may not assert this action as defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

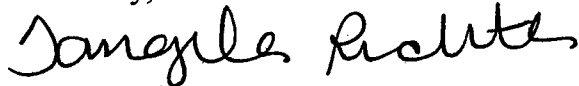
In addition, please be advised that the Division of Enforcement has access to all information you provide to the staff of the Division of Corporation Finance in connection with our review of your filing or in response to our comments on your filing.

We will consider a written request for acceleration of the effective date of the registration statement as a confirmation of the fact that those requesting acceleration are aware of their respective responsibilities under the Securities Act of 1933 and the Securities Exchange Act of 1934 as they relate to the proposed public offering of the securities specified in the above registration statement. We will act on the request and, pursuant to delegated authority, grant acceleration of the effective date. We direct your attention to Rules 460 and 461 regarding requesting acceleration of a registration statement. Please allow adequate time after the filing of any amendment for further review before submitting a request for acceleration. Please provide this request at least two business days in advance of the requested effective date.

New Frontier Energy, Inc.
November 17, 2005
page 3

Please direct all questions relating to the above comments to Susan Min, at (202) 551-3727, or in his absence, to the undersigned, at (202) 551-3685. Direct all correspondence to the following ZIP code: 20549-7010.

Sincerely,

A handwritten signature in black ink, appearing to read "Tangela Richter". The signature is fluid and cursive, with the first name "Tangela" written in a larger, more prominent script than the last name "Richter".

Tangela Richter
Branch Chief

cc: S. Min

via facsimile
Dave Stefanski, Esq.
(303) 296-8880