



DIVISION OF
CORPORATION FINANCE

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

October 28, 2009

By Facsimile and U.S. Mail

Mr. Eldar Sætre
Chief Financial Officer
StatoilHydro ASA
Forusbeen 50, N-4035
Stavanger, Norway

Re: StatoilHydro ASA
Form 20-F for the Fiscal Year Ended December 31, 2008
Filed March 24, 2009
Response Letter Dated July 29, 2009
Response Letter Dated October 8, 2009
File No. 001-15200

Dear Mr. Sætre:

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

Sincerely,

Mark C. Shannon
Branch Chief