



DIVISION OF
CORPORATION FINANCE
MAIL STOP 4628

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

December 1, 2009

Via U.S. Mail and Fax (604-669-4776)

Mr. Charles E. Jenkins
Chief Financial Officer
White Mountain Titanium Corporation
1188 West Georgia Street, Suite 2150
Vancouver, B.C.
Canada V6E4A2

**Re: White Mountain Titanium Corporation
Form 10-K for the Fiscal Year Ended December 31, 2008
Filed March 31, 2009
Form 10-K/A for the Fiscal Year Ended December 31, 2008
Filed September 25, 2009
Form 10-Q for the Fiscal Quarter Ended June 30, 2009
Filed August 10, 2009
Form 10-Q/A for the Fiscal Quarter Ended June 30, 2009
Filed September 25, 2009
Form 10-Q for the Fiscal Quarter Ended September 30, 2009
Filed November 13, 2009
Form 10-Q/A for the Fiscal Quarter Ended June 30, 2009
Filed December 1, 2009
File No. 333-129347**

Dear Mr. Jenkins:

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

Sincerely,

Chris White
Branch Chief