



DIVISION OF
CORPORATION FINANCE

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

February 24, 2009

Mr. Alford B. Neely
Chief Financial Officer
CREDO Petroleum Corporation
1801 Broadway, Suite 900
Denver, Colorado 80202-3837

Re: CREDO Petroleum Corporation
Form 10-K for the Fiscal Year Ended October 31, 2008
Filed January 14, 2009
File No. 000-08877

Dear Mr. Neely:

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