



DIVISION OF  
CORPORATION FINANCE

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

June 18, 2010

Mr. Stefan Wenger  
Chief Financial Officer  
Royal Gold, Inc.  
1660 Wynkoop Street, Suite 1000  
Denver, Colorado 80202

**Re: Royal Gold, Inc.**  
**Form 10-K for Fiscal Year Ended June 30, 2009**  
**Filed August 21, 2009**  
**File No. 001-13357**

Dear Mr. Wenger:

We have completed our review of your filings and do not have any further comments at this time.

Sincerely,

H. Roger Schwall  
Assistant Director