



DIVISION OF  
CORPORATION FINANCE  
MAIL STOP 7010

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
100 F Street, NE  
WASHINGTON, D.C. 20549-7010

September 18, 2007

Roland M. Jermyn, Jr.  
President, Chief Executive and Financial Officer  
Alpha Petroleum Exploration Corporation  
1211 North Westshore Blvd., Suite 511  
Tampa, FL 33607

**Re: Alpha Petroleum Exploration Corporation**  
**Item 4.01 Form 8-K**  
**Filed September 12, 2007**  
**File No. 0-9563**

Dear Mr. Jermyn:

We have reviewed your filing and have the following 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 comments are 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 more information so we may better understand your disclosure. After reviewing this information, we may 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 filing. We look forward to working with you in these respects. We welcome any questions you may have about our comments or any other aspect of our review. Feel free to call us at the telephone number listed at the end of this letter.

Item 4.01 Form 8-K filed September 12, 2007

1. You explain that effective May 4, 2007, you engaged Bernstein & Pinchuk LLP as the principal accountant to audit your financial statements. We note from your Form 10-K for the Fiscal Year Ended September 30, 2000, and their report dated May 21, 2001, that your previous principal accountant was Moore Stephens, P.C. in New York, New York. However, we could not locate an Item 4.01(a) Form 8-K disclosing whether your previous accountants were dismissed, resigned, or declined to stand for re-election. Please amend your document to provide the

disclosures required by Item 304(a) of Regulation S-K, including the related Exhibit 16 letter from your previous accountants.

Please also amend your document to provide all the disclosures required by Item 4.01(b) of the Form 8-K instructions regarding your new independent accountants.

2. We also remind you that events required to be reported on Form 8-K should be reported within four business days after the occurrence of the event. Please see General Instruction B to Form 8-K for additional guidance.

#### Closing Comments

As appropriate, please amend your filing and file your supplemental response via EDGAR to respond to these comments within five business days. Please note that if you require longer than five business days to respond, you should contact the staff immediately to request additional time. Please understand that we may have additional comments after reviewing your amendment and responses to our comments.

We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes all information required under the Securities Exchange Act of 1934 and that they have provided all information investors require for an informed investment 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.

In connection with responding to our comment, please provide, in writing, a statement from the company acknowledging that:

- the company is responsible for the adequacy and accuracy of the disclosure in the filing;
- staff comments or changes to disclosure in response to staff comments do not foreclose the Commission from taking any action with respect to the filing; and
- the company may not assert staff comments as a 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 our review of your filing or in response to our comments on your filing.

Mr. Roland M. Jermyn, Jr.  
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You may contact Mark Wojciechowski at (202) 551-3759 if you have questions regarding the comments. Please contact me at (202) 551-3683 with any other questions.

Sincerely,

Jill Davis  
Branch Chief