



DIVISION OF  
CORPORATION FINANCE

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

October 8, 2009

Via U.S. mail and facsimile

Mr. Kevan Hensman  
Chief Financial Officer  
Aspen Exploration Corporation  
2050 S. Oneida St., Suite 208  
Denver, CO 80224-2426

**Re: Aspen Exploration Corporation  
Preliminary Schedule 14A  
Filed September 16, 2009  
File No. 0-09494**

Dear Mr. Hensman:

We have completed our review of your Preliminary Schedule 14A filing and have no further comments at this time.

Sincerely,

Anne Nguyen Parker  
Branch Chief

cc: N. Gholson  
Peter Waltz, Esq. – Burns, Figa & Will, P.C. (facsimile (303) 796-2777)