



May 3, 2012

Securities and Exchange Commission
Division of Corporation Finance
100 F Street, N.E.
Washington, D.C. 20549-3628

Attention: John Reynolds
Assistant Director
Division of Corporation Finance

Re: Arch Coal, Inc.
Registration Statement on Form S-4 (No. 333-179842)
Request for Acceleration of Effectiveness

Ladies and Gentlemen:

Pursuant to Rule 461 promulgated under the Securities Act of 1933, as amended (the "Securities Act"), Arch Coal, Inc. (the "Company") hereby respectfully requests that the effective date of the above-referenced Registration Statement be accelerated so that the same will become effective under the Securities Act at 3:00 p.m., Eastern Daylight Time, on May 3, 2012, or as soon as practicable thereafter.

Additionally, the Company hereby acknowledges the following:

- (i) Should the Securities and Exchange Commission (the "Commission") or the staff, acting pursuant to delegated authority, declare the filing effective, it does not foreclose the Commission from taking any action with respect to the filing;
- (ii) The action of the Commission or the staff, acting pursuant to delegated authority, in declaring the filing effective, does not relieve the Company from its full responsibility for the adequacy and accuracy of the disclosure in the filing; and
- (iii) The Company may not assert staff comments and the declaration of effectiveness as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

Very truly yours,

By: /s/ John T. Drexler
John T. Drexler
Senior Vice President and
Chief Financial Officer