

APOLLO GOLD CORP  
Form AW  
February 22, 2008

**Apollo Gold Corporation**  
**5655 South Yosemite Street, Suite 200**  
**Greenwood Village, Colorado 80111**

February 22, 2008

Securities and Exchange Commission  
Division of Corporation Finance  
450 Fifth Street, NW  
Washington, DC 20549-1004  
Mail Stop 7010  
Attn: Donna Levy

Re: Apollo Gold Corporation

CIK No. 0000938113  
Withdrawal of Post-Effective Amendment No. 1 to Form S-1 on Form S-3  
File No. 333-109511

Ladies and Gentlemen:

Pursuant to Rule 477 of the Securities Act of 1933, as amended, Apollo Gold Corporation (the "Company") hereby requests that the Securities and Exchange Commission take appropriate action to withdraw the Company's Post-Effective Amendment No. 1 to Form S-1 on Form S-3 (File No. 333-109511) filed on August 2, 2005. The registration statement is being withdrawn at the request of the Securities and Exchange Commission in its letter dated January 4, 2008 to the Company.

If you have any questions, please do not hesitate to contact me at (720) 886-9656.

Very truly yours,

By: /s/ Melvyn Williams

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Melvyn Williams  
Chief Financial Officer and  
Senior Vice President - Finance and Corporate  
Development