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 The registration statement is being withdrawn at the request of the Securities and Exchange Commission in its letter dated January 4, 2008 to the Company.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

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