



DIVISION OF
CORPORATION FINANCE

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

January 22, 2013

Via Facsimile

Peter-Mark Vogel
Chief Executive Officer
Manas Petroleum Corporation
Bahnhofstrasse 9
6341 Baar
Switzerland

Re: Manas Petroleum Corporation
Form 10-K for the Fiscal Year December 31, 2011
Filed March 30, 2012
File No. 333-107002

Dear Mr. Vogel:

We refer you to our comment letter dated December 21, 2012 regarding business contacts with Iran and Sudan. We have completed our review of this subject matter. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or 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. 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 the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Cecilia Blye

Cecilia Blye, Chief
Office of Global Security Risk

cc: Roger Schwall
Assistant Director
Division of Corporation Finance