



DIVISION OF  
CORPORATION FINANCE

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

Mail Stop 4628

January 18, 2018

Via E-mail

Niall Nolan  
Chief Financial Officer  
Navigator Holdings LTD.  
21 Palmer Street  
London, SW1H 0AD  
United Kingdom

**Re: Navigator Holdings LTD.  
10-K for Fiscal Year Ended December 31, 2016  
Filed March 1, 2017  
File No. 001-36202**

Dear Mr. Nolan:

We refer you to our comment letter dated December 21, 2017, regarding business contacts with Sudan and Syria. We have completed our review of this subject matter. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

/s/ Cecilia Blye

Cecilia Blye, Chief  
Office of Global Security Risk

cc: Ann Parker  
Assistant Director  
Division of Corporation Finance