January 7, 2008

By U.S. Mail and facsimile to (205) 326-1858

James T. McManus, II President and Chief Executive Officer Energen Corporation 605 Richard Arrington Jr. Boulevard North Birmingham, AL 35203-2707

> Re: Energen Corporation Definitive 14A Filed March 22, 2007 File No. 1-07810

Dear Mr. McManus:

We have completed our review of your executive compensation and related disclosure, and we have no further comments at this time.

Please note that the company is responsible for the adequacy and accuracy of the disclosure in its filing. We are not approving any proposed disclosure you may have included in your response letter or any disclosure you include in your future filings in response to our comments.

If you have any further questions regarding our review of your filing, please call me at (202) 551-3238.

Sincerely,

Ellie Quarles Special Counsel

cc: J. David Woodruff
General Counsel and Secretary