

UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549-0405

January 29, 2008

Ms. Anna M. Williams Chief Financial Officer HKN Inc. 180 State Street, Suite 200 Southlake, TX 76092

Re: HKN Inc.

Form 10-K for Fiscal Year Ended December 31, 2006

Filed February 28, 2007

Response Letter Dated January 23, 2008

File No. 1-10262

Dear Ms. Williams:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments.

Sincerely,

Jill S. Davis Branch Chief