



DIVISION OF  
CORPORATION FINANCE

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

September 9, 2008

Mr. Mel G. Riggs  
Chief Financial Officer  
Clayton Williams Energy, Inc.  
Six Desta Drive, Suite 6500  
Midland, Texas 79705-5510

**Re: Clayton Williams Energy, Inc.  
Form 10-K for Fiscal Year Ended December 31, 2007  
Filed March 14, 2008  
File No. 1-10924**

Dear Mr. Riggs:

We have completed our review of your filing and have no further comments at this time.

Sincerely,

Karl Hiller  
Branch Chief