



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549-7010

February 27, 2009

Kent Watts
President, Chief Executive Officer, and Chairman of the Board
Hyperdynamics Corporation
One Sugar Creek Center Boulevard, Suite 125
Sugar Land, TX 77478

Re: Hyperdynamics Corporation
Preliminary Proxy Statement on Schedule 14A
Filed October 2, 2008
File No. 1-32490

Dear Mr. Watts:

We have completed our review of your preliminary proxy statement on Schedule 14A and have no further comments at this time.

Sincerely,

Anne Nguyen Parker
Branch Chief

cc: Joel Seidner
(281) 667-3292