HESS CORPORATION

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November 23, 2011

Ms. Susan M. Cosper
Technical Director
Financial Accounting Standards Board
401 Merritt 7 PO Box 5116
Norwalk, CT 06856-5116

File Reference No.: 2011-05, Comprehensive Income (Topic 220)

Dear Ms. Cosper:

Hess Corporation (Hess or the Corporation) appreciates the opportunity to comment on the Proposed Accounting Standards Update 2011-05, Comprehensive Income (Topic 220) (ASU 2011-05). Hess is a global integrated energy company primarily engaged in the exploration for and production of crude oil and natural gas, the manufacturing of refined petroleum products and the purchasing, trading and marketing of refined petroleum products, natural gas and electricity. The Corporation is a registrant with the U.S. Securities and Exchange Commission and is classified as a large accelerated filer.

The Corporation is fully supportive of deferring the requirement to separately present within line items on the face of the income statement reclassification adjustments out of accumulated other comprehensive income. In addition, we believe that the Board should permanently eliminate this presentation requirement. In our opinion, this level of detail appears excessive for inclusion on the face of the income statement and would add unnecessary complexity for readers of the financial statements.

Currently, Hess does not have the processes or systems in place to track all reclassification adjustments (e.g., pension expense amortization) to each individual line item on the income statement or, where applicable, the balance sheet. For example, pension costs may be allocated to multiple line items on the income statement or may be capitalized as part of a project and subsequently depreciated over several years. As a result, implementing a process to track and evaluate this information would require significant incremental costs by the Corporation, for which we do not foresee a corresponding benefit. Therefore, except for the pre-existing disclosure requirements related to derivative instruments in currently effective accounting standards, we believe that the Board should not require either presentation or disclosure of these reclassifications by income statement component.

Thank you for the opportunity to provide comments on this proposed ASU. I would be pleased to discuss our views with you at your convenience.

Sincerely yours,

John Rielly
Senior Vice President and
Chief Financial Officer