



DIVISION OF  
CORPORATION FINANCE

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

June 29, 2009

Mr. Alton D. Heckaman, Jr.  
Executive Vice President and Chief Financial Officer  
Swift Energy Company  
16825 Northchase Drive, Suite 400  
Houston, TX 77060

**Re: Swift Energy Company**  
**Form 10-K for the Fiscal Year Ended December 31, 2008**  
**Filed February 27, 2009**  
**Schedule 14A filed April 1, 2009**  
**Form 10-Q for the Fiscal Quarter Ended March 31, 2009**  
**Filed May 7, 2009**  
**Response Letter filed June 18, 2009**  
**File No. 1-08754**

Dear Mr. Heckaman:

We have completed our review of your Form 10-K and related filings and have no further comments at this time.

Sincerely,

H. Roger Schwall  
Assistant Director

cc: C. White  
S. Eisen  
T. Levenberg  
N. Gholson