



DIVISION OF  
CORPORATION FINANCE

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

June 3, 2019

William Heissenbittel  
Chief Financial Officer  
Royal Gold, Inc.  
1660 Wynkoop Street, Suite 1000  
Denver, CO 80202

**Re: Royal Gold, Inc.**  
**Form 10-K for Fiscal Year Ended June 30, 2018**  
**Filed August 9, 2018**  
**File No. 001-13357**

Dear Mr. Heissenbittel:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance  
Office of Beverages, Apparel and  
Mining