

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

DIVISION OF CORPORATION FINANCE

October 8, 2019

A. Wade PursellChief Financial OfficerSM Energy Company1775 Sherman Street, Suite 1200Denver, Colorado 80203

Re: SM Energy Company Form 10-K for Fiscal Year Ended December 31, 2018 Filed February 21, 2019 File No. 001-31539

Dear Mr. Pursell:

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 Energy & Transportation