



DIVISION OF  
CORPORATION FINANCE

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

October 22, 2019

Gary S. Guidry  
President and Chief Executive Officer  
Gran Tierra Energy Inc.  
900, 520-3 Avenue SW  
Calgary, Alberta Canada T2P 0R3

**Re: Gran Tierra Energy Inc.**  
**Form 10-K for the Fiscal Year ended December 31, 2018**  
**Filed February 27, 2019**  
**File No.: 001-34018**

Dear Mr. Guidry:

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