

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

DIVISION OF CORPORATION FINANCE

October 17, 2019

Andrew J. Littlefair President and Chief Executive Officer Clean Energy Fuels Corp. 4675 MacArthur Court, Suite 800 Newport Beach, CA 92660

> Re: Clean Energy Fuels Corp. Form 10-K for Fiscal Year Ended December 31, 2018 Filed March 12, 2019 File No. 001-33480

Dear Mr. Littlefair:

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