



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

DIVISION OF  
CORPORATION FINANCE

October 20, 2020

Pablo Manuel Vera Pinto  
Chief Financial Officer  
Vista Oil & Gas, S.A.B. de C.V.  
Calle Volcán 150, Floor 5  
Colonia Lomas de Chapultepec, Alcaldía Miguel Hidalgo  
Mexico City, 11000  
Mexico

**Re: Vista Oil & Gas, S.A.B. de C.V.**  
**Form 20-F for the Fiscal Year Ended December 31, 2019**  
**Filed April 30, 2020**  
**File No. 001-39000**

Dear Mr. Pinto:

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

cc: Emilio Minvielle