



DIVISION OF  
CORPORATION FINANCE

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

October 8, 2019

A. Wade Pursell  
Chief Financial Officer  
SM Energy Company  
1775 Sherman Street, Suite 1200  
Denver, 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