

June 14, 2024

M. Jay Allison
Chief Executive Officer
Comstock Resources, Inc.
5300 Town and Country Blvd., Suite 500
Frisco, TX 75034

Inc.

Statement on Form S-3

Re: Comstock Resources,

Registration

Filed June 10, 2024

File No. 333-280104

Dear M. Jay Allison:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Please contact Anuja

Majmudar at 202-551-3844 with any questions.

Sincerely,

Division of Corporation Finance

Office of Energy & Transportation

cc:

Jack E. Jacobsen