



5300 Town and Country Blvd., Suite 500  
Frisco, Texas 75034

November 21, 2019

**Via EDGAR**

U.S. Securities and Exchange Commission  
100 F Street, NE, Mail Stop 3561  
Washington, D.C. 20549  
Attention: Ms. Anuja A. Majmudar

Re: Comstock Resources, Inc.  
Registration Statement on Form S-3  
Filed November 13, 2019  
File No. 333-234685

Dear Ms. Majmudar:

Pursuant to Rule 461 promulgated under the Securities Act of 1933, as amended, Comstock Resources, Inc. (the "Registrant") hereby requests acceleration of effectiveness of its Registration Statement on Form S-3 (File No. 333-234685), to Monday, November 25, 2019, at 9:00 a.m. Eastern Time, or as soon as possible thereafter.

Very truly yours,

/s/ ROLAND O. BURNS  
Roland O. Burns  
President and Chief Financial Officer

cc: *Locke Lord LLP*  
Jack Jacobsen