

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

July 3, 2024

André van Niekerk Chief Financial Officer Gatos Silver, Inc. 925 W Georgia Street , Suite 910 Vancouver, British Columbia, Canada V6C 3L2

> Re: Gatos Silver, Inc. Form 10-K for the Fiscal Year Ended December 31, 2023

Filed February 21, 2024 File No. 001-39649

Dear André van Niekerk:

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