

March 6, 2023

Craig Kesler  
Chief Financial Officer  
Eagle Materials Inc.  
5960 Berkshire Lane, Suite 900  
Dallas, Texas 75225

Re: Eagle Materials

Inc.

Form 10-K for the

Fiscal Year Ended March 31, 2022

Filed May 20, 2022

File No. 001-12984

Dear Craig Kesler:

We have limited our review of your filing to the financial statements and related disclosures and have the following comment.

Please respond to this comment within ten business days by providing the requested information or advise us as soon as possible when you will respond. If you do not believe our comment apply to your facts and circumstances, please tell us why in your response.

After reviewing your response to this comment, we may have additional comments.

Form 10-K for the Fiscal Year Ended March 31, 2022

Management Discussion and Analysis of Financial Condition and Results of Operations  
Fiscal Year 2022 vs. Fiscal Year 2021 Results by Segment, page 43

1. We note that you present net revenue for certain of your segments, which excludes freight and delivery costs billed to customers. This appears to be a non-GAAP measure that would be considered individually tailored and have the effect of changing the recognition and measurement principles applied in accordance with GAAP. Please explain to us how you considered Question 100.04 of the Non-GAAP Financial Measures Compliance and Disclosure Interpretations.

Craig Kesler  
FirstName LastNameCraig Kesler  
Eagle Materials Inc.  
Comapany NameEagle Materials Inc.  
March 6, 2023  
March2 6, 2023 Page 2  
Page  
FirstName LastName

In closing, 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.

You may contact Eiko Yaoita Pyles, Staff Accountant, at 202-557-3587 or Melissa Gilmore, Senior Staff Accountant, at 202-551-3777 with any questions.

Sincerely,

Division of

Corporation Finance

