

October 31, 2024

Steven Tholen  
Chief Financial Officer  
HighPeak Energy, Inc.  
421 W. 3rd St., Suite 1000  
Fort Worth , Texas 76102

Re: HighPeak Energy, Inc.  
Form 10-K for the Fiscal Year ended December 31, 2023  
Filed March 6, 2024  
File No. 001-39464

Dear Steven Tholen:

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

Office of Energy &

Finance

Transportation