

July 6, 2022

Jack Hightower
Chief Executive Officer and Chairman
HighPeak Energy, Inc.
421 W. 3rd Street, Suite 1000
Fort Worth, Texas 76102

Inc.

Statement on Form S-3

Re: HighPeak Energy,

Registration

Filed June 29, 2022

File No. 333-265895

Dear Mr. Hightower:

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 Michael Purcell at 202-551-5351 with any questions.

Sincerely,

Division of Corporation Finance

Office of Energy & Transportation

cc:

Jackson A. O'Maley