September 23, 2022

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

Re: HighPeak Energy,

Form 10-K for the

Fiscal Year ended December 31, 2021

Filed March 7, 2022 File No. 001-39464

Dear Mr. Tholen:

Inc.

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