



421 W. 3rd Street, Suite 1000  
Fort Worth, TX 76102

September 23, 2022

**Via EDGAR**

Office of Energy & Transportation  
United States Securities and Exchange Commission  
Division of Corporation Finance  
100 F Street, N.E.  
Washington, D.C. 20549-3561

**Re: Request for Acceleration of Effectiveness of Registration Statement on Form S-3 (Registration No. 333-267311) of HighPeak Energy, Inc.**

Ladies and Gentlemen,

On behalf of HighPeak Energy, Inc. and pursuant to Rule 461 promulgated under the Securities Act of 1933, as amended, the undersigned hereby requests that the effective date of the above-referenced Registration Statement on Form S-3 be accelerated to 4:00 p.m., Washington, D.C. time, on Tuesday, September 27, 2022, or as soon thereafter as practicable.

Thank you for your assistance with this matter. If you need any additional information, please contact Sarah K. Morgan of Vinson & Elkins L.L.P. at (713) 758-2977 or Jackson A. O'Maley of the same firm at (713) 758-3374.

Very truly yours,

**HIGHPEAK ENERGY, INC.**

By: /s/ Steven W. Tholen

Name: Steven W. Tholen

Title: Chief Financial Officer