

UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549

September 8, 2025

Todd Telesz Chief Financial Officer Hallador Energy Co 1183 East Canvasback Drive Terre Haute, Indiana 47802

> Re: Hallador Energy Co Form 10-K for the Fiscal Year ended December 31, 2024 Filed March 17, 2025 File No. 001-34743

Dear Todd Telesz:

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

cc: Sean Ewen