



DIVISION OF  
CORPORATION FINANCE

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

March 24, 2015

Via E-mail

Mr. Lucas Schneider  
Chief Financial Officer  
Highwater Ethanol, LLC  
24500 US Highway 14  
Lamberton, MN 56152

**Re: Highwater Ethanol, LLC  
Form 10-K for the Fiscal Year Ended October 31, 2014  
Filed January 28, 2015  
File No. 0-53588**

Dear Mr. Schneider:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ John Cash

John Cash  
Accounting Branch Chief

cc: Miranda Hughes, Esq.  
BrownWinick