



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 4628

May 3, 2018

Richard F. Betz  
Chief Executive Officer  
Resolute Energy Corporation  
1700 Lincoln Street, Suite 2800  
Denver, Colorado 80203

**Re: Resolute Energy Corporation  
Registration Statement on Form S-4  
Filed April 25, 2018  
File No. 333-224439**

Dear Mr. Betz:

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 Anuja A. Majmudar, Attorney-Advisor, at 202-551-3844 with any questions.

Sincerely,

/s/ Kevin M. Dougherty *for*

John Reynolds  
Assistant Director  
Office of Natural Resources

cc: Ron Levine, Esq.  
Arnold & Porter