



DIVISION OF
CORPORATION FINANCE

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

November 1, 2021

Arthur Halleran
President & Chief Executive Officer
Trillion Energy International Inc.
Turan Gunes, Bulvari, Park Oran Ofis Plaza
180-y, Daire:54, Kat:16, 06450, Oran, Cankaya, Anakara, Turkey

Re: Trillion Energy International Inc.
Registration Statement on Form S-4
Filed October 25, 2021
Amendment No. 1 to Registration Statement on Form S-4
Filed October 27, 2021
File No. 333-260489

Dear Mr. Halleran:

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 Liz Packebusch, Staff Attorney, at (202) 551-8749 with any questions.

Sincerely,

Division of Corporation Finance
Office of Energy & Transportation

cc: William L. Macdonald