



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

DIVISION OF  
CORPORATION FINANCE

September 23, 2022

Steven Tholen  
Chief Financial Officer  
HighPeak Energy, Inc.  
421 W. 3rd St., Suite 1000  
Fort Worth, TX 76102

**Re: HighPeak Energy, Inc.**  
**Form 10-K for the Fiscal Year ended December 31, 2021**  
**Filed March 7, 2022**  
**File No. 001-39464**

Dear Mr. Tholen:

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