



DIVISION OF
CORPORATION FINANCE

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

June 6, 2022

Richard Palmer
Chief Executive Officer
Global Clean Energy Holdings, Inc.
2790 Skypark Drive
Suite 105
Torrance, California 90505

Re: Global Clean Energy Holdings, Inc.
Registration Statement on Form S-3
Filed June 1, 2022
File No. 333-265332

Dear Mr. Palmer:

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 Michael Davis at 202-551-4385 or Celeste Murphy at 202-551-3257 with any questions.

Sincerely,

Division of Corporation Finance
Office of Life Sciences

cc: Calvin Cheng