

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

October 31, 2024

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

> Re: HighPeak Energy, Inc. Form 10-K for the Fiscal Year ended December 31, 2023 Filed March 6, 2024 File No. 001-39464

Dear Steven 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