

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

June 7, 2023

Ron Bain Chief Financial Officer VAALCO Energy, Inc. 9800 Richmond Avenue, Suite 700 Houston, Texas 77042

> Re: VAALCO Energy, Inc. Form 10-K for the Fiscal Year ended December 31, 2022 Filed April 6, 2023 File No. 001-32167

Dear Ron Bain:

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