

July 24, 2025

Office of Energy & Transportation United States Securities and Exchange Commission Division of Corporation Finance 100 F Street, N.E. Washington, D.C. 20549

Attn: John Hodgin, Karl Hiller

Re: VAALCO Energy, Inc.

Form 10-K for Fiscal Year Ended December 31, 2024

Filed March 17, 2025 File No. 001-32167 Request for Extension

Dear Messrs. Hodgin and Hiller:

VAALCO Energy, Inc. (the "<u>Company</u>") acknowledges receipt of the comment letter of the Staff of the U.S. Securities and Exchange Commission dated July 18, 2025 (the "<u>Comment Letter</u>"), relating to the Company's Form 10-K for the fiscal year ended December 31, 2024.

The Comment Letter requests that the Company respond within ten business days or advise of the later date that by which the Company will respond. This letter is to confirm our telephone conversation on July 23, 2025, regarding our request for an extension of time to respond.

We are working expeditiously to respond to the Comment Letter. However, as discussed, given that we are in the midst of our preparations to file our Form 10-Q for the quarter ended June 30, 2025, we respectfully request that you allow us to submit our response by August 15, 2025.

The Company greatly appreciates the Staff's accommodation for the request for extension. If you have any questions about this letter or require additional information, please contact me at matthew.powers@vaalco.com.

Respectfully submitted,

VAALCO Energy, Inc.

/s/ Ronald Bain Ronald Bain Chief Financial Officer

cc: Matthew Powers Jordan Hirsch, Hunton Andrews Kurth LLP