



**May 21, 2026**

**Via EDGAR**

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

**Re: Request for Acceleration of Effectiveness of Registration Statement on Form S-3 (File No. 333-295905) of KLX Energy Services Holdings, Inc.**

Ladies and Gentlemen:

On behalf of KLX Energy Services Holdings, Inc., and pursuant to Rule 461 under the Securities Act of 1933, as amended, the undersigned hereby requests that the effective date of the above-referenced Registration Statement be accelerated so that it may become effective at 4:00 p.m., Washington, D.C. time, on May 22, 2026, or as soon as practicable thereafter.

Thank you for your assistance in this matter. If you need any additional information, please contact Sarah K. Morgan of Vinson & Elkins L.L.P. at (713) 758-2977 or Katherine Terrell Frank of Vinson & Elkins L.L.P. at (214) 220-7869.

[Signature Page Follows]



Very truly yours,

KLX Energy Services Holdings, Inc.

By: /s/ Max L. Bouthillette

Name: Max L. Bouthillette

Title: Executive Vice President, General Counsel,  
Chief Compliance Officer and Corporate Secretary

Cc: Sarah K. Morgan, Vinson & Elkins L.L.P.  
Katherine Terrell Frank, Vinson & Elkins L.L.P.

*SIGNATURE PAGE TO  
ACCELERATION REQUEST*