

**XWELL, Inc.**  
**254 West 31st Street, 11th Floor**  
**New York, New York 10001**

June 27, 2025

**VIA EDGAR**

Division of Corporation Finance  
Office of Trade & Services  
U.S. Securities and Exchange Commission  
Washington, D.C. 20549  
Attention: Ms. Cara Wirth and Ms. Mara Ransom

Re: XWELL, Inc.  
Registration Statement on Form S-3  
Originally filed on February 7, 2025, as amended on April 29, 2025, June 3, 2025, and June 20, 2025  
File No. 333-284768 (as amended, the “**Registration Statement**”)  
Request for Acceleration

Ladies and Gentlemen:

Pursuant to Rule 461 of the Rules and Regulations of the Securities and Exchange Commission (the “**Commission**”) under the Securities Act of 1933, as amended, XWELL, Inc. (the “**Company**”), hereby respectfully requests acceleration of the effective date of the Registration Statement, so that it may become effective at 4:30 p.m., Eastern Time, on June 30, 2025, or as soon thereafter as practicable.

Should any member of the staff of the Commission have any questions or comments with respect to this request, please contact our counsel, Haynes and Boone, LLP, attention: Alla Digilova, Esq. at (212) 659-4993.

Very truly yours,

**XWELL, INC.**

By: /s/ Ezra T. Ernst  
Ezra T. Ernst  
President and Chief Executive Officer

cc: Alla Digilova, Esq., Haynes and Boone, LLP

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