



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549-4628

October 22, 2009

Mr. Chris E. Celano
Vice President and General Counsel
Vantage Drilling Company
777 Post Oak Boulevard, Suite 610
Houston, TX 77056

Re: Vantage Drilling Company
Preliminary Proxy Statement on Schedule 14A
Filed August 31, 2009
File No. 1-34094

Dear Mr. Celano:

We have completed our review of your Schedule 14A filed August 31, 2009 and have no further comments at this time.

Sincerely,

H. Roger Schwall
Assistant Director

cc: Bryan Brown
(713) 226-6291