



DIVISION OF  
CORPORATION FINANCE

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

November 10, 2010

Douglas G. Smith  
Chief Financial Officer  
Vantage Drilling Company  
777 Post Oak Boulevard, Suite 610  
Houston, Texas 77056

**Re: Vantage Drilling Company**  
**Form 10-K for the Fiscal Year Ended December 31, 2009**  
**Filed March 16, 2010**  
**File No. 1-34094**

**Preliminary Proxy Statement on Schedule 14A**  
**Filed August 13, 2010**

Dear Mr. Smith:

We have completed our review of your filings and do not have any further comments at this time.

Sincerely,

H. Roger Schwall  
Assistant Director