



DIVISION OF  
CORPORATION FINANCE

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

June 3, 2019

Thomas J. Cimino  
Chief Financial Officer  
Vantage Drilling International  
777 Post Oak Boulevard, Suite 800  
Houston, TX 77056

**Re: VANTAGE DRILLING INTERNATIONAL**  
**Registration Statement on Form S-1**  
**Filed May 24, 2019**  
**File No. 333-231736**

Dear Mr. Cimino:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Anuja A. Majmudar, Attorney-Advisor, at (202) 551-3844 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Natural Resources

cc: Rod Miller