

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

DIVISION OF CORPORATION FINANCE

Mail Stop 3561

January 16, 2018

Hugh Baker Chief Financial Officer Scorpio Bulkers Inc. 9, Boulevard Charles III MC 98000 Monaco

> Re: Scorpio Bulkers Inc. Registration Statement on Form F-3 Filed January 5, 2018 File No. 333-222448

Dear Mr. Baker:

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 Sonia Bednarowski at (202) 551-3666 with any questions.

Sincerely,

/s/ Justin Dobbie

Justin Dobbie Legal Branch Chief Office of Transportation and Leisure

cc: Lawrence Rutkowski Seward & Kissel LLP