

Mail Stop 6010

October 27, 2006

Mr. Mark A. Blinn  
Vice President and Chief Financial Officer  
Flowserve Corporation  
5215 N. O'Connor Boulevard, Suite 2300  
Irving, Texas 75039

RE: **Flowserve Corporation**  
**Form 10-K for the fiscal year ended December 31, 2005**  
**Filed June 30, 2006**  
**File No. 1-13179**

Dear Mr. Blinn:

In connection with our financial statement only review of Flowserve Corporation's Form 10-K and subsequent Exchange Act filings, we have the following additional accounting comments.

Form 10-K for the fiscal year ended December 31, 2005

General

1. We note the revised text of your proposed risk factor, including the language "... state sponsors of terrorism, **including** Iran and Syria" (emphasis added). Please clarify for us whether you or your subsidiaries have direct or indirect business contacts with countries other than Iran and Syria that have been identified as state sponsors of terrorism by the State Department. If you have such contacts, please provide the same type of information and analysis regarding those contacts as you previously have provided to us regarding your subsidiaries' contacts with Iran and Syria. If you have no such contacts, please revise the proposed risk factor language to make clear that Iran and Syria are the only State Department-designated terrorist-sponsoring states in which you have business operations and sales.

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As appropriate, please respond to these comments within 10 business days or tell us when you will provide us with a response. Please furnish a cover letter with your response that keys your responses to our comments and provides any requested supplemental information. Detailed cover letters greatly facilitate our review. Please file your cover letter on EDGAR. Please understand that we may have additional comments after reviewing your responses to our comments.

You may contact Dennis Hult, Staff Accountant, at (202) 551-3618 or me at (202) 551-3554 if you have questions regarding comments on the financial statements and related matters. In this regard, do not hesitate to contact Martin James, Senior Assistant Chief Accountant, at (202) 551-3671.

Sincerely,

Angela J. Crane  
Accounting Branch Chief