



DIVISION OF  
CORPORATION FINANCE

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

June 7, 2019

Stuart Spence  
Chief Financial Officer  
MCDERMOTT INTERNATIONAL INC  
757 N. Eldridge Parkway  
Houston, Texas 77079

**Re: MCDERMOTT INTERNATIONAL INC**  
**Form 10-K for Fiscal Year Ended December 31, 2018**  
**Filed February 25, 2019**  
**File No. 001-08430**

Dear Mr. Spence:

We have completed our review of your filing. 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.

Sincerely,

Division of Corporation Finance  
Office of Manufacturing and  
Construction