



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

DIVISION OF
CORPORATION FINANCE

Mail Stop 4628

May 15, 2018

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 9, 2018
File No. 333-224793**

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,

/s/ Kevin M. Dougherty for

John Reynolds
Assistant Director
Office of Natural Resources

cc: Rod Miller, Esq.
Milbank, Tweed, Hadley & McCloy LLP