

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

July 17, 2024

Robert W. Eifler Chief Executive Officer Noble Corporation plc 13135 Dairy Ashford, Suite 800 Sugar Land, TX 77478

> Re: Noble Corporation plc Registration Statement on Form S-4 Filed July 9, 2024 File No. 333-280726

Dear Robert W. Eifler:

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 Cheryl Brown at 202-551-3905 with any questions.

Sincerely,

Division of Corporation Finance Office of Energy & Transportation

cc: Kyle Seifried, Esq.