

Noble Finco Limited
13135 Dairy Ashford, Suite 800
Sugar Land, Texas 77478

April 7, 2022

VIA EDGAR

United States Securities and Exchange Commission
Division of Corporation Finance
Office of Energy & Transportation
100 F Street, NE
Washington, D.C. 20549

Attention: John Cannarella
Karl Hiller
Christina Chalk
Karina Dorin
Laura Nicholson

Re: Noble Finco Limited
Registration Statement on Form S-4, as amended
File No. 333-261780

Ladies and Gentlemen:

Reference is made to our letter, filed as correspondence via EDGAR on April 6, 2022, in which we requested the acceleration of the effective time of the above-referenced Registration Statement for 3:00 p.m., Eastern Time, on April 8, 2022, in accordance with Rule 461 promulgated under the Securities Act of 1933, as amended. We are no longer requesting that such Registration Statement be declared effective at this time and we hereby formally withdraw our request for acceleration of the effective time. Thank you for your assistance in this matter.

Please contact Sean Wheeler, Debbie Yee or Anne Peetz of Kirkland & Ellis LLP at (713) 836-3427, (713) 836-3630 or (713) 836-3711, respectively, if you have any questions or concerns regarding this matter.

Sincerely,

NOBLE FINCO LIMITED

By: /s/ Robert W. Eifler

Name: Robert W. Eifler

Title: Chief Executive Officer and Director

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