

NABORS INDUSTRIES INC  
Form RW  
July 31, 2008

[NABORS INDUSTRIES, INC. AND NABORS INDUSTRIES LTD.]

July 31, 2008

***Via EDGAR***

Ms. Laura Nicholson  
Securities and Exchange Commission  
Division of Corporation Finance  
100 F Street, N.E.  
Washington, D.C. 20549

**Re: Nabors Industries, Inc. and Nabors Industries Ltd.  
Registration Statement (File No. 333-151053) on Form S-4  
Filed May 20, 2008**

Dear Ms. Nicholson:

Further to your conversation with our counsel and pursuant to Rule 477 under the Securities Act of 1933, as amended, Nabors Industries, Inc., a Delaware corporation, and Nabors Industries Ltd., a Bermuda exempted company, (collectively, the Registrants ), hereby request that the above captioned Registration Statement be withdrawn effective as of the date hereof. As discussed, the Registrants believe the withdrawal to be consistent with the public interest and the protection of investors given that the Registrants intend to promptly file a new Registration Statement covering all of Nabors Industries, Inc. s \$975,000,000 6.15% Senior Notes due 2018. The Registrants represent that no securities have been offered or sold pursuant to the Registration Statement.

**NABORS INDUSTRIES LTD.**

By: /s/ Bruce P. Koch  
Name: Bruce P. Koch  
Title: Chief Financial Officer and Vice  
President

**NABORS INDUSTRIES, INC.**

By: /s/ Bruce P. Koch  
Name: Bruce P. Koch  
Title: Chief Financial Officer and Vice  
President