

while the technical specifications did not call for alternatives, the same functionality could have been achieved using a larger quantity of positive displacement meters in smaller sizes or using alternative technologies such as ultrasonic meters or displacement tanks. Such products and technologies were and are readily available from multiple non-US sources and as such, the Company believes such products and technologies would not be significant or material to the end user in Sudan.

In connection with this response, the Company acknowledges that:

- The Company is responsible for the adequacy and accuracy of the disclosures in the filing;
- Staff comments or changes to disclosure in response to staff comments do not foreclose the Commission from taking any action with respect to the filing; and
- The Company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

Should the staff have any further questions with respect to the information provided in this letter, please contact me by telephone at 281-591-4585 or by email to jeffrey.carr@fmcti.com.

FMC Technologies, Inc.
