

Mail Stop 6010

June 26, 2008

Deni Zodda  
Senior Vice President and Chief Financial Officer  
NovaDel Pharma, Inc.  
25 Minneakoning Road  
Flemington, NJ 08822

**Re: NovaDel Pharma, Inc.  
Preliminary Proxy Statement on Schedule 14A  
Filed June 3, 2008  
File No. 1-32177**

Dear Mr. Zodda:

We have completed our review of your proxy statement and have no further comments at this time. Please contact Song Brandon at (202) 551-3621 with any questions.

Sincerely,

Jeffrey Riedler  
Assistant Director

cc: Emilio Ragoza, Esq.  
Christine Aubin Zoino, Esq.  
Morgan, Lewis & Bockius LLP  
502 Carnegie Center  
Princeton, NJ 08540