



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549-7010

January 10, 2011

Via Mail and Facsimile (212-983-3115)

Michail S. Zolotas  
Chief Executive Officer  
NewLead Holdings Ltd.  
83 Akti Miaouli & Flessa Str.  
Piraeus Greece 185 38

**Re: NewLead Holdings Ltd.  
Form 20-F for the Fiscal Year Ended December 31, 2009  
Filed March 18, 2010  
File No. 1-32520  
Response Letter Filed January 5, 2011**

Dear Mr. Zolotas:

We refer you to our comment letters dated November 10, 2010 and September 29, 2010 regarding business contacts with Iran. We have completed our review of this subject matter and have no further comments at this time.

Sincerely,

Cecilia Blye, Chief  
Office of Global Security Risk

cc: Max Webb  
Assistant Director  
Division of Corporation Finance

Todd Mason, Esq. (via facsimile)  
Mintz Levin