

January 26, 2006

Mr. Kam Shah
Chief Executive and Financial Officer
Bontan Corporation Inc.
47 Avenue Road, Suite 200
Toronto, Ontario M5R 2G3

Re: Bontan Corporation Inc.
Form 20-F for Fiscal Year Ended March 31, 2004

Filed August 30, 2004
Form 20-F/A for Fiscal Year Ended March 31, 2005
Filed November 29, 2005
File No. 0-30314

Dear Mr. Shah:

We have completed our review of your Forms 20-F and related filings and do not, at this time, have any further comments.

Sincerely,

Jill S. Davis
Branch Chief

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Mr./Ms.
Company Name
Date, 2005
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UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
100 F Street, NE
WASHINGTON, D.C. 20549-7010

DIVISION OF
CORPORATION FINANCE
MAIL STOP 7010