

Mail Stop 4561
July 3, 2006

Stanley A. Lybarger
BOK Financial Corporation
President and Chief Executive Officer
Bank of Oklahoma Tower
P.O. Box 2300
Tulsa, Oklahoma 74192

Re: BOK Financial Corporation
Form 10-K for Fiscal Year Ended December 31, 2005
Form 10-K/A for Fiscal Year Ended December 31, 2005
Filed June 8, 2006 and June 29, 2006
Form 10-Q for Quarter Ended March 31, 2006
File No. 000-19341

Dear Mr. Lybarger:

We have completed our review of your Form 10-K and related filings and have no further comments at this time.

Sincerely,

Amit Pande
Assistant Chief Accountant