## January 3, 2011

By U.S. Mail and Facsimile to (918) 588-6853

Mr. Steven E. Nell Executive Vice President and Chief Financial Officer BOK Financial Corporation Bank of Oklahoma Tower P.O. Box 2300 Tulsa, Oklahoma 74192

**Re:** BOK Financial Corporation

Form 10-K for the fiscal year ended December 31, 2009

File No. 000-19341

Dear Mr. Nell:

We have completed our review of your Form 10-K and related filings and do not have any further comments at this time.

Sincerely,

Marc Thomas Reviewing Accountant