



DIVISION OF
CORPORATION FINANCE

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

October 18, 2010

By U.S. Mail and Facsimile to (011-822-2125-2293)

Pal Seung Lee
Chairman and Chief Executive Officer
Woori Finance Holdings Co., Ltd
203 Hoehyon-dong, 1-ga,
Chung-gu
Seoul 100-792, Korea

Re: Woori Finance Holdings Co., Ltd
Form 20-F for the Fiscal Year Ended December 31, 2009
File No. 1-31811

Dear Mr. Lee:

We have completed our review of your Form 20-F and related filings and have no further comments at this time on the specific issues raised.

Sincerely,

John P. Nolan
Senior Assistant Chief Accountant