



DIVISION OF
CORPORATION FINANCE

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

April 5, 2011

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

Re: Woori Finance Holdings Co., Ltd.
Form 20-F for the Fiscal Year Ended December 31, 2009
Filed June 25, 2010
File No. 1-31811
Response Letters Dated December 30, 2010 and March 21, 2011

Dear Mr. Lee:

We refer you to our comment letters dated December 1, 2010 and January 14, 2011 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: Todd Schiffman
Assistant Director
Division of Corporation Finance