

Mail Stop 3561

April 5, 2006

Mr. Mark W. Harding
President and Chief Financial Officer
Pure Cycle Corporation
8451 Delaware Street
Thornton, CO 80260

Re: Pure Cycle Corporation
Form 10-KSB for the Fiscal Year Ended August 31, 2005
Filed November 28, 2005
File No. 0-08814

Dear Mr. Harding:

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

Sincerely,

Jim Allegretto
Senior Assistant Chief Accountant