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September 17, 2004

BY EMAIL

Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

**Re: Certification: New York Mercantile Exchange, Inc.
Submission #04.121 (Listing of Additional Strike Prices for the
Gold, Copper, Natural Gas and Related Calendar Spread Option
Contracts)**

Dear CFTC Commissioners:

Pursuant to COMEX Rule 15.03(c), COMEX Rule 17.04 and NYMEX Rule 300.20, the President of the New York Mercantile Exchange, Inc. ("Exchange") has directed that additional strike prices be added for certain contract months in the Gold, Copper, Natural Gas and related Calendar Spread option contracts as detailed below:

- (A) On September 14, 2004, the Exchange added a call and a put:
- (1) at the strike price of -500 for the October 2004 contract month of the Natural Gas Calendar Spread option contract;
 - (2) at the strike price of -800 for the October 2004 contract month of the Natural Gas Calendar Spread option contract;
 - (3) at the strike price of 6550 for the December 2005 contract month of the Natural Gas option contract;
- (B) On September 15, 2004, the Exchange added a call and a put:
- (4) at the strike price of 134 for the October 2004 contract month of the Copper option contract;
 - (5) at the strike price of 136 for the November 2004 contract month of the Copper option contract;

(6) at the strike price of 122 for the May 2005 contract month of the Copper option contract;

(7) at the strike prices of 500 and 520 for the August 2005 contract month of the Gold option contract;

(C) On September 16, 2004, the Exchange added a call and a put:

(8) at the strike price of 128 for the November 2004 contract month of the Copper option contract;

(9) at the strike price of 500 for the November 2004 contract month of the Gold option contract;

(10) at the strike price of 5050 for the March 2005 contract month of the Natural Gas option contract;

(11) at the strike price of 8750 for the June 2005 contract month of the Natural Gas option contract; and

(12) at the strike price of 8750 for the September 2005 contract month of the Natural Gas option contract.

Pursuant to the terms of COMEX Rule 15.03(c), COMEX Rule 17.04 and NYMEX Rule 300.20, the strike prices noted above are in increments that are consistent with the pricing for the underlying futures contract. COMEX Rule 15.03(c), COMEX Rule 17.04 and NYMEX Rule 300.20 permit such directed strike prices to be effective upon adoption, provided that notice to the CFTC is given within three business days of the strike price listing.

Should you have any questions concerning the above, please contact the undersigned at (212) 299-2207.

Very truly yours,

Brian Regan
Vice President & Counsel

cc: Christopher K. Bowen
George Henderson
Michael Campanelli